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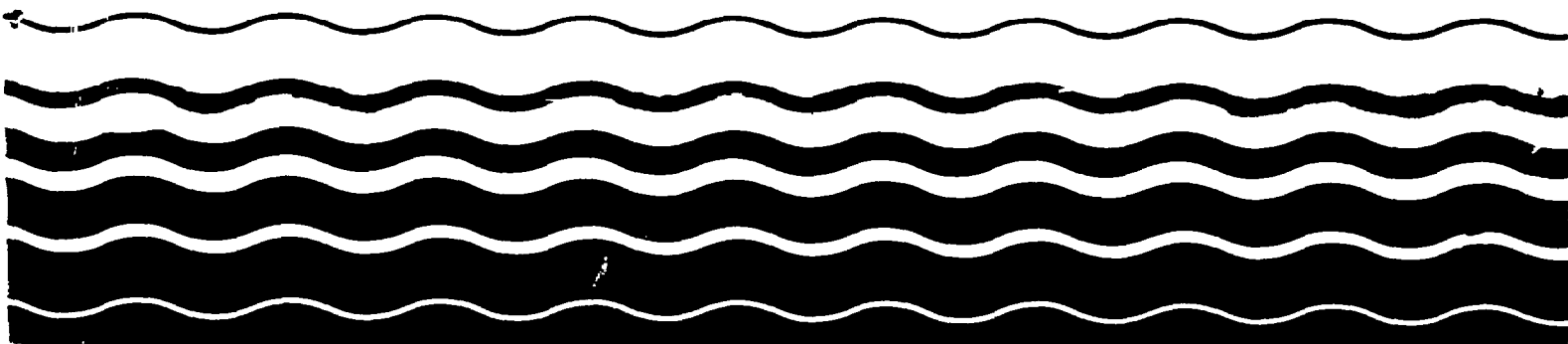
United States
Environmental Protection
Agency

Office Of Water
(WH-546)

21W-7002
March 1991



Municipal Water Pollution Prevention Program



MUNICIPAL WATER POLLUTION PREVENTION

March 1991

U. S. Environmental Protection Agency
Office of Water (WH-546)
401 M Street, S. W.
Washington, D. C. 20460

EPA PROGRAM TO PROMOTE MUNICIPAL WATER POLLUTION PREVENTION

I. EPA'S POLLUTION PREVENTION APPROACH

The Pollution Prevention Act of 1990 establishes pollution prevention as national policy. The Act sets forth a formal legislative charter for the Agency to establish programs to promote pollution prevention. In the Act, Congress "declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner." Through this statement, the Act establishes the pollution prevention "hierarchy." The Agency will, to the extent possible, encourage practices which shift activities upward within the hierarchy, with source reduction as the most preferred option.

For clarity within the pollution prevention hierarchy, EPA has defined strict "pollution prevention" as the use of processes, products or practices that reduce or eliminate the generation of pollutants and wastes, including those that protect natural resources through conservation or more efficient utilization. Pollution prevention can be achieved by reducing reliance on toxic raw materials, by changing processes through increasing efficiency, and by changing outputs.

The Municipal Water Pollution Prevention (MWPP) program encourages municipalities to apply elements of the pollution prevention hierarchy. Publicly owned treatment works (POTWs) not only discharge wastewater, but may contribute to the releases of various air emissions and solid

waste streams as a result of their activities and the activities of their indirect dischargers. MWPP may also play a valuable part in addressing releases of various air emissions and solid waste streams. There are additional opportunities to achieve pollution prevention through industrial source reduction under the pretreatment program.

II. MUNICIPAL WATER POLLUTION PREVENTION

The vast majority of Americans today are enjoying the benefits of clean water. Since passage of the Clean Water Act (CWA) in 1972, federal, State and local governments have produced real improvements in water quality. Consequently, capital investments, supported by effective enforcement activities, have resulted in 90 percent of the nation's major POTWs being capable of meeting permit limits. We must now maintain this significant and valuable investment to ensure continued environmental health, water quality, and economic well-being for future generations. As EPA, the States, and local governments address new challenges in the areas of municipal growth and newly regulated pollutants, we must also ensure a viable wastewater treatment infrastructure.

EPA will promote municipal water pollution prevention by supporting and encouraging States to develop programs that provide for the implementation of a variety of pollution prevention activities and maintain municipal wastewater treatment facility permit compliance. This represents a significant shift from current practices by stressing a preventive approach to water pollution abatement rather than one of remedial action. The program is directed at preventing pollution from both influent to the POTW and through activities at the plant.

Successful State MWPP programs should include:

- a mechanism for routine assessments of the compliance status of POTWs. Such a mechanism often includes an early warning system based on periodic self-audits and quantitative techniques for assessing the condition of municipal wastewater treatment systems.
- a reporting process on the capability of POTWs to sustain compliance.
- a process for identifying, implementing, and tracking corrective actions to prevent pollution and maintain compliance.
- a program that will encourage POTWs to develop pollution prevention projects; for example, loadings reduction projects and energy and water conservation projects for household dischargers might be promoted.

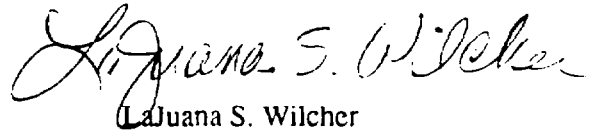
The MWPP program applies primarily to POTWs that have the physical capability to comply with their NPDES permit requirements. While these facilities must continue to meet all compliance deadlines, they may also begin to consider pollution prevention opportunities. EPA will continue to take vigorous enforcement action against POTWs violating their NPDES permit limits. For facilities under the MWPP program, compliance with MWPP reporting requirements and preventive measures will be stressed.

To implement successful MWPP programs, EPA will work jointly with States and municipalities to adopt pollution prevention programs that attain the following objectives:

- preventing violations of wastewater permit requirements and maintain high POTW compliance rates;
- maximizing the useful lives of POTWs by encouraging preventive approaches such as improved operation and maintenance, appropriate pricing, financial management and accounting practices, and reduced wastewater flows and loading; and

- ensuring timely planning and financing for future needs and economic growth prior to the occurrence of wastewater permit violations.

EPA recognizes that constructing adequate wastewater treatment facilities is not sufficient. MWPP programs should consider residential and industrial programs designed to reduce flow and loadings, which, in turn, reduce energy and decrease demand for capacity. This approach, as well as the recycling and beneficial use of sludge, is already being undertaken in several communities across the nation. Early problem identification, through strategies based on pollution prevention, can substantially contribute to preserving our infrastructure and protecting our water quality in a cost effective manner.



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MUNICIPAL WATER POLLUTION PREVENTION GUIDANCE

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I. INTRODUCTION

Since the enactment of the 1972 Amendments to the Federal Water Pollution Control Act, more than \$73 billion in federal, State, and local funds have been invested in the construction of municipal wastewater treatment facilities. Moreover, under the Environmental Protection Agency's (EPA) National Municipal Policy, important strides have been made to improve the ability of municipalities to comply with Clean Water Act permit requirements. As a result of the large capital investments and the National Municipal Policy, the quality of our nation's municipal water pollution control infrastructure has significantly improved.

EPA's recent Needs Survey shows that, using current approaches, as the population grows and current treatment systems deteriorate more than \$80 billion in additional funds will be needed over the next 20 years to keep pace with the need for refurbishment and construction of additional facilities. Billions of dollars more will be necessary for newly emerging needs associated with sludge handling, stormwater, combined sewer overflows, toxics, and groundwater protection.

EPA believes that the most effective and equitable means of assuring viability of this infrastructure is through environmentally preferred pollution prevention approaches especially through application of Municipal Water Pollution Prevention (MWPP). These approaches may enhance worker safety, improve the usability of sludge, increase the ability for local community expansion, and reduce operation and compliance costs.

Pollution prevention can reduce the need for substantial capital investment in new infrastructure by emphasizing source reduction at the facility, not increases in the size and complexity of the treatment works.

In the context of the significant investment which has been made in the municipal wastewater

treatment infrastructure over the last 20 years and the planned termination of federal financial assistance after 1994, there is a strong concern and interest that:

- the quality of the infrastructure be maintained;
- facilities not be allowed to deteriorate;
- municipal compliance rates remain high; and
- degradation of water quality be reduced or eliminated.

To address these concerns, EPA has embarked on a cooperative effort in partnership with the States to promote State-based MWPP programs. States will have the flexibility to determine whether to implement such a program and how to design their programs.

As the federal government's role in funding for construction grants ends, there is both a need for and an opportunity to develop new strategies which enhance and complement significant gains made by this investment in our wastewater treatment infrastructure. The primary goal is the adoption of pollution prevention measures to meet the expanding demands and extend the life of existing facilities.

State-based municipal pollution prevention programs focus attention on a series of actions to prevent pollution in advance rather than taking more expensive corrective actions. MWPP encourages resource conservation to reduce water and energy use, appropriate pricing, toxicity reductions at the source, BOD reductions, recycling, proper treatment of wastes, and beneficial uses of sludge. Toward this end, States should be concerned with:

- assessing the operations and physical capabilities of municipal wastewater facilities on a regular basis to determine their capability to

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meet treatment requirements both currently and into the future.

- monitoring a series of early warning indicators which identify emerging problems before they occur.
- receiving reports on the performance of municipal pollution prevention programs on a regular basis so that necessary adjustments can be made.
- encouraging municipalities to take action long before problems occur by holding municipalities accountable for the implementation of necessary preventive measures.
- designing mechanisms and enforceable tools at the State level so that such programs are adopted throughout the State.
- providing necessary technical assistance by the State and EPA to help get these programs established and to help municipalities assess the condition of their facilities and undertake preventive actions on a regular and recurring basis.

BENEFITS OF MWPP PROGRAMS

MWPP is an improved approach to managing and regulating municipal sewage treatment facilities. An aggressive, anticipatory approach has potential benefits for everyone with a responsibility for such facilities.

Local Communities

For the operator of a treatment plant, a periodic assessment of the status of the plant against explicit criteria yields important information which helps the operator look for new opportunities to encourage pollution prevention, to diagnose emerging problems and to design actions to deal with them. A requirement for the responsible local officials to review and approve a systematic report provides

an opportunity for the operator to brief the officials on the status of the facility and to bring recommended corrective actions to their attention.

The local decision-maker benefits from a greater understanding of the publicly owned treatment work (POTW) and its role serving the community. Early warning about future needs allows the local official to plan ahead to avoid such expenditures or to plan for and rank capital needs. Periodic information also enables local decision-makers to factor prevention and/or infrastructure investment considerations into any economic and population growth plans or developmental strategies the community may have. Finally, sound operation of the facility contributes to the quality of life in the community through improvements in health, aesthetics and recreational opportunities.

State Governments

MWPP will assist States in meeting their water quality objectives and prove to be a powerful tool for maintaining high compliance rates. To the extent that the useful life of facilities can be extended through prevention, flow reduction, and sound maintenance or more efficient use of existing capacity, future capital needs to finance the replacement of current plants may be reduced or deferred.

Federal Government

Many of the benefits listed above are benefits to the federal government as well since it shares the same objectives. This is especially true in States where EPA is responsible for administering the National Pollutant Discharge Elimination System (NPDES) program.

MWPP will contribute to the protection of the federal investment in municipal sewage treatment facilities. It also serves a major Agency priority, pollution prevention, in two important ways. First,

preventive actions may often include appropriate water pricing, upstream water conservation, toxicity and BOD reduction, or infiltration/inflow control measures that could reduce or defer facility needs. Second, contaminants are prevented from being discharged to receiving waters. Since planning and constructing facilities often takes years, a preventive approach avoids years of discharges above environmentally desirable levels while the necessary improvements are put in place.

EPA/STATE MEETINGS/WORKSHOPS

In FY 1989, EPA conducted two meetings with State and Regional representatives to discuss MWPP program development. At these meetings, EPA and the State representatives concluded that:

- MWPP programs should contain some type of early warning system and a rating system to identify POTWs with potential problems.
- MWPP programs should cover all effluent limits and consider the entire sewer system, not just the treatment works.
- Municipalities should plan for future financial conditions.

EPA decided as a result of these meetings to conduct joint workshops with the States. In an attempt to include all the Regions and States in the decision-making process, EPA held four Regional/State workshops on the MWPP program between November 1989 and January 1990 in Kansas City, Missouri; Windsor Locks, Connecticut; Charlotte, North Carolina; and Denver, Colorado. The key findings and a detailed summary of the workshops are contained in Appendix A.

HISTORY OF THE MWPP CONCEPT

The concept of developing programs to maintain POTW compliance was first identified at the State level. As illustrated in the descriptions of a few of the existing or piloted programs, MWPP

approaches are varied (see Appendix B for detailed descriptions of the Wisconsin, New Mexico and Texas programs). Programs need to be flexible so they can be tailored to the specific needs of the State and municipalities. A sound MWPP program that achieves desired effects need not necessarily encompass all aspects recommended in this guidance.

The Wisconsin MWPP program was developed over a five year period with direct involvement of those most affected by the program including municipal government officials and POTW operators. This resulted in a comprehensive, widely supported program with an early warning system to identify potential problems prior to noncompliance. In addition, the Wisconsin program's planning aspects have in some cases extended to targeting recruitment of specific industries to maximize use and capabilities of local POTWs.

Concurrently, other pollution prevention activities were beginning at EPA. EPA encouraged a new emphasis on pollution prevention. EPA began to study ongoing pollution prevention efforts by States, local governments and industries. The Agency observed that some cities, like Hayward and San Leandro in California, focused on working with existing industries to promote source reduction. Seven POTWs in North Carolina provide on-site pollution prevention technical assistance to industrial dischargers to the POTWs. In Suffolk County, New York the POTW requires businesses to identify pollution prevention techniques that could be employed when applying for a wastewater discharge permit. In some of these cases, waste streams were altered or eliminated resulting in decreased monitoring and reporting costs.

II. PROGRAM COMPONENTS AND OPTIONS

Effective and successful State-based municipal pollution prevention programs include several

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components. This section explains these components and provides options and procedural factors for States to consider in developing their MWPP programs.

EARLY WARNING SYSTEMS

A common factor leading to noncompliance is the failure of a community to adequately plan to meet existing and future needs, either through prevention-based programs or through timely construction of new or expanded facilities.

A major component of any MWPP program should be the assessment on a regular basis of the operational and physical capabilities, and financial status of the wastewater treatment infrastructure. Systems may be developed which require municipalities to report performance against a series of indicators and parameters which can identify pollution prevention opportunities and provide early warning of potential future pollution or compliance problems. An early warning system will enable States and municipalities to identify problems early and allow municipalities to take appropriate corrective action before violations occur.

The precise form of an early warning system can vary from State to State depending upon the availability of resources and each State's program implementation philosophy. There are a number of potential early warning criteria from which a State might select indicators. The following is a list of indicators that should be considered in the development of the MWPP early warning system. However, this list is not exhaustive. EPA urges States to consider including multiple indicators to identify problems.

- *Influent actual flow versus influent design flow:* detects potential for future hydraulic overloading of the system; overloading is usually caused by excessive stormwater runoff or extensive growth.

- *Actual BOD₅ loading versus BOD₅ design loading:* detects potential for future organic overloading of the system; overloading is usually caused by municipal and industrial growth.
- *Potential for community and industrial growth:* anticipates future residential and industrial pretreatment problems with hydraulic, toxic and organic loading.
- *Number of overflows and bypasses of the system:* anticipates problems with surface water quality due to untreated wastewater bypassing the system; usually caused by heavy rainfall or snowmelt or equipment failure.
- *Operator training and certification practices:* anticipates potential operation problems due to improperly trained personnel.
- *Sludge storage and disposal capacity:* anticipates future capacity shortages of sludge storage and disposal.
- *Facility age:* anticipates future maintenance problems due to an aging facility.
- *Effluent quality versus permit limits:* analyzes past violations of effluent limits and indicates the existence of treatment efficiency and operation problems.
- *New requirements:* anticipates the impact of changed standards or permit modifications for toxic discharges, sludge and combined sewer overflows.
- *Financial status of the facility:* anticipates the facility's fiscal ability, both now and in the future, to maintain, make improvements or expand the wastewater treatment system, including a review of the adequacy of the facility's user charge, water pricing policies and cost accounting systems.

A State might elect to monitor any number of these or other indicators, depending upon the feasible and desired level of detail. Generally, the greater the number of indicators selected for monitoring the more likely that the early warning system will detect a potential problem.

For some States, selecting a large number of indicators may not be feasible because of the size of the State and number of POTWs. In such cases, the States may choose to evaluate POTWs based on a few indicators or criteria. For example, If a treatment facility consistently operates very near its design capacity, it is likely that the system will be both hydraulically and organically overloaded and that the facility's treatment efficiency and effluent quality will be negatively affected. Therefore, comparison of the actual flow through a treatment system versus the design flow or permitted flow of the system is an appropriate indicator, although not necessarily the only appropriate indicator, of the overall potential for future compliance problems.

In addition to selecting a set of indicators, each State should determine how it will evaluate the information generated by the indicators. The evaluation procedure may consist of a point system that produces a score for each facility based upon the selected indicators. Alternatively, a State might establish thresholds for an indicator and evaluate the facility based upon whether or not it exceeds the thresholds.

For whichever system it uses the State should define "trigger points" that require some action by the State, municipality, and facility. The State may have a system of escalating responses as a facility reaches increasing point totals or surpasses threshold levels. Finally, the point system or threshold levels might be used as an initial screening device and address the problems at potentially troublesome facilities on a case by case basis.

Three possible options for structuring an early warning system are presented below. The first two

options involve using a point system to evaluate a set of early warning indicators; the third option involves using a threshold criterion to evaluate a single indicator.

Option 1: Set of Indicators/Point System/ Escalating Response

An effective method of evaluating a set of early warning indicators is to assign a point scale to each indicator and to add the points for each indicator at a facility to obtain a total score for the facility. The number of possible points assigned to a particular indicator would depend upon the State's assessment of that indicator's importance.

A State may also decide to establish a system of possible responses to the early warning indicator scores. The level of State action should increase as a facility's indicator point total increases. State responses should range from "no action" for low point totals to "formal enforcement" for high point totals. State technical assistance and requirements for planning and implementing facility improvements and capacity expansion would be triggered with median range point totals.

The State of Wisconsin has adopted the above approach to evaluating indicators and determining the appropriate level of State response. Wisconsin has three levels of response for three different point ranges. Any necessary corrective action by the facility owner is voluntary at the lowest point range. The State recommends operational and needs reviews for facilities with middle range scores and requires reviews and action plans for high scoring facilities.

Option 2: Set of Indicators/Point System/ Individual Review

Some States may choose to use a point system with the early warning indicators as an initial screening tool for identifying facilities with potential problems. A review board then identifies

those facilities in need of individual assistance and determines the proper course of State action.

The State of New Mexico took this approach in evaluating data generated from its early warning system. The State was able to take this highly individualized approach due to the relatively small number of facilities evaluated.

Option 3: Few Criteria/Threshold Exceedence/ Escalating Response

States with a large universe of treatment facilities might choose to base their early warning systems on a few criteria such as effluent flow versus design flow, facility age and new requirements (see Chapter II, page 4). For example, a State choosing this structure establishes increasing threshold values for effluent flow based upon specified percentages of the system's design flow. If a treatment facility exceeds the initial threshold, the State might respond with a recommendation that the facility examine prevention-based strategies, define its future capacity needs, and assess cost effective options. At the median threshold level, the State might require that the facility initiate planning for appropriate water pricing, water conservation, toxicity reduction at the source, BOD reduction, or other prevention-based measures. Should such approaches be inadequate, plans could then be made for facility expansion and improvement. When the facility reaches the highest threshold, the States might require that the facility begin implementing its plan.

The State of Texas has adopted an early warning system based on an escalating response. When flow measurements at a treatment facility reach 75 percent of its permitted flow for three consecutive months, Texas responds with a letter to the permittee requiring initiation of engineering and financial planning for necessary facility expansion and improvement. At 90 percent of the permitted flow, the permittee is required to obtain the necessary authorization from the Texas Water Commission to begin construction.

REPORTING MECHANISMS

The value of an early warning system is enhanced if the results are formally and routinely reported to the local governmental decision-makers and the State so that proper planning and corrective actions occur. The choice of a reporting mechanism will depend upon the type of early warning system and evaluation approach taken. For example, early warning information may be formally submitted in a report, taken from existing data reports, or collected directly by the State. These three options for reporting mechanisms are discussed below.

Option 1: Self-Audit Reporting Form

A State that has developed a set of indicators covering several aspects of treatment facility operations might develop a special reporting form for recording indicator measurements and scoring the facility on the basis of these measurements. This type of form may require self-reporting by the facility operators. The form should be reviewed by the facility owner or the municipality before being submitted to the State.

The State of Wisconsin uses a reporting form for its early warning system. Facility operators report information relevant to the early warning indicators and use this information to score their facilities. They also subjectively answer self-evaluative information about the operations and financial status of their facilities. After the operator completes the form, the facility owner reviews it and, based upon the scores, lists the steps it will take to maintain compliance at the facility.

The local officials must file a certification with the report that acknowledges the findings and specifies, if appropriate, cost effective corrective actions. This process forces the responsible officials to become aware of the status of the facility and to commit to the necessary corrective actions. The benefit of this approach is that local decision-

makers must participate in determining what action needs to be taken as opposed to being told by the State.

Self-audit reporting forms are most suitable for State programs that choose a comprehensive set of indicators, when the desired information is routinely available to the State. Financial status, for example, is not now typically reported to the State. At the same time, such reports imply some additional work for State staff since the reports have to be reviewed and evaluated.

Option 2: Existing Data

States evaluating a few indicators, including effluent flow rate, may be able to use existing data to monitor facilities. For example, facilities are required to submit discharge monitoring reports (DMRs) in which they report their effluent flow rates. States could collect the information from DMRs pertinent to the early warning evaluation and make comparisons. The State of Texas uses DMRs to collect monthly flow rate information for facilities in that State.

Reliance on existing data has some advantages: (1) it creates no new reporting burdens for the operator; (2) the reports can be automated, thereby reducing State workload; and (3) the "trigger points" can be built into the automated system, thereby simplifying the evaluation process. A program relying on a single indicator is, however, less comprehensive since no single indicator is a good surrogate for all the potential problems.

Option 3: State Inspections

State inspections might be an appropriate technique for information collection in some States. Inspections are particularly beneficial if they are designed as comprehensive assessments of treatment facility operations and used to supplement existing State data on treatment facilities. Inspections allow the State to have a great deal of control

over the quality of information used to evaluate a facility, but they also require more resources. Limited time, money, and manpower may prevent States from relying upon State inspections as the sole approach to collecting the necessary information for early warning evaluation of treatment facilities.

CORRECTIVE ACTIONS AND PROGRAM MANAGEMENT

Corrective Actions

An effective State-based MWPP program establishes a set of processes to ensure that, once an emerging problem is identified, appropriate cost effective corrective actions are selected and carried out in a timely fashion. The facility operator and/or the entity responsible for it should bear an enforceable obligation to identify and take corrective action. There are several steps in the corrective action process. First, since the early warning system is a screening device, the facility should undertake a more comprehensive analysis of the potential problem. A formal analytical step is less important in cases where a comprehensive self-audit is required as the early warning system. Second, since there are several possible solutions to most problems, there should be an option selection step where a course of action is chosen based on pollution prevention potential and cost effectiveness of alternatives. This program encourages such decisions to be based on the pollution prevention hierarchy. For example, where municipalities are approaching capacity limits, they may set specific goals to reduce flow, loadings and toxic discharges through source reduction and closed loop recycling activities, eliminating the need for facility expansion. Finally, the action plan should be implemented on a timely basis.

A significant element is the State's role in corrective actions. At a minimum, States should provide for a review and/or approval of proposed corrective actions and track the adequacy of implementation. Additionally, States should have the

ability to enforce MWPP requirements through State laws, regulations, permit conditions, etc. The response to failure to report or to take corrective action depends on the State MWPP implementation philosophy and may involve such steps as publicity on recalcitrant facilities, letters requiring information or the preparation and submission of facility plans, sewer moratoria, administrative orders requiring action, court actions, cash penalties.

States should consider including MWPP in their overall Enforcement Management System with definitions of appropriate enforcement actions for various violations and escalation of enforcement responses in the face of continued non-compliance. For example, delays in submitting the annual report could be handled with a warning letter. A sewer connection ban may be an appropriate response in the case of a facility with capacity problems that has not adopted a corrective action plan. Administrative orders may be an appropriate response if major implementation milestones are not met. Obviously, when untimely corrective action results in violation of effluent standards, the State may seek penalties. States have already adopted enforcement strategies for NPDES programs, and should consider extending those strategies to cover MWPP.

States should consider the role of technical assistance to facilities needing corrective action. New Mexico tested a program that was voluntary for treatment facilities and relied entirely on incentives in the form of State assistance to persuade communities to participate. EPA, the States and the private sector offer a host of technical assistance programs to provide support to municipalities. These programs include operation and maintenance, operator certification and training, small community technology/financing, user charge analysis, municipal technology transfer, etc. In many States these programs have been managed independently of one another. A well executed State MWPP program would integrate

these various programs to support common State pollution prevention objectives. An integrated review of these programs can aid in preventing pollution and noncompliance and help minimize the need for more costly enforcement to assure compliance.

Assistance to POTWs may also encompass financial planning assistance and economic incentives. For example, an innovative feature of one existing State MWPP program is interest rate reductions on State Revolving Fund (SRF) loans to POTWs with good compliance records. This contrasts with providing funds to municipalities with poor compliance histories based solely on needs. These innovative incentives encourage POTWs to maintain compliance and create rewards for exemplary conduct.

Management Tracking

An MWPP program should incorporate an information and status tracking system for facilities included in the scope of the program. Since the implementation of some corrective actions may take years, the system should have the ability to track status for lengthy periods. Possible milestones for tracking are:

- Performance against early warning system indicators
- Timely receipt of reports
- Timely review of reports
- Dispatch of notification to facility
- Review/approval of corrective action
- Status of corrective action
- Completion of corrective action

States that choose to develop a set of indicators and a self-auditing form for facilities may wish to

establish a computerized data base for storing and analyzing the incoming data from facilities. A computerized tracking system can be especially useful for large States or States that choose to monitor several indicators. Computerized tracking would also be useful when a data base containing the relevant information element already exists, such as DMR data. If early warning information is tracked by computer, a computer program could be easily created to automatically alert the State.

States that have a small universe of facilities subject to the MWPP program and desire a more individualized approach to addressing potential compliance problems may choose to manually track information. In New Mexico, a review board, after an initial screening of potentially troublesome facilities, recommends action on a case by case basis. There is no formal automated tracking system. This approach is less resource intensive and may be appropriate for States with fewer communities and a limited number of indicators.

In any case, most States already have some type of automated information system for municipal facilities. When automated MWPP tracking systems are desired, existing systems should be evaluated to see if they can be adapted for MWPP purposes.

Another aspect of tracking involves the dissemination of the information to the appropriate State or external organizations that can effectively utilize the data generated. Within the State agency, units that deal with compliance, outreach, operator training, user charge reviews, etc. should be provided access to the data.

Program Evaluation

An integral component of any program is a mechanism to evaluate whether the program is achieving its stated objectives. States are urged to build the evaluation mechanism into their programs.

Quantifiable measures of progress are preferable, although evaluations can be qualitative as well. Some possible measures for the MWPP program are:

- Trends in compliance rates
- Number of facilities identifying potential problems
- Per cent of facilities completing corrective actions on schedule
- Compliance with MWPP requirements
- Appropriate environmental indicators

Other possible measures may be activity indicators, such as the number of facilities assisted by the State. Whatever measures are chosen, it is a good practice to establish a base line from which progress can be measured.

OTHER CONSIDERATIONS

There are other issues a State should consider in developing its municipal pollution prevention program:

Which Facilities

States will need to decide whether all or only some municipal facilities should be included in State MWPP programs. One potential reason for limiting participation is that large States with numerous facilities may face resource constraints in trying to apply the program to all their facilities. For example, the program could be oriented towards major facilities on the assumption that malfunctions at major facilities carry a greater risk to human health and the environment. Conversely, small communities could be targeted on the assumption that these facilities have a greater need for evaluation or assistance than the majors.

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The States of Wisconsin, Texas and New Mexico have chosen to address all wastewater treatment facilities under their respective programs.

Obtaining Support

As they develop their programs, States should consider the need to build support for the program. For example, the State of Wisconsin invested several years in the development of its program. During this period, Wisconsin held 22 workshops for elected officials, facility operators, public works personnel and representatives of environmental groups. It also established a 19-member advisory committee which participated actively in shaping the program. Wisconsin attributes the success of its program to its careful developmental process. At the other extreme, Texas, which tracks one indicator through existing reporting mechanisms, chose not to go through a similar process.

Some of the factors that may influence the States' investment in consultation and generating support include the complexity of the program, the new burdens being placed on treatment facilities, the extent of departures from existing procedures, and the degree to which new requirements are applied as part of the MWPP program.

III. FUNDING FOR MWPP PROGRAMS

This section discusses various funding sources for State development of MWPP programs. In particular, it focuses on existing and potential federal funding sources available to States.

EXISTING FEDERAL FUNDING SOURCES

The existing Clean Water Act (CWA) authorities offer opportunities for States to develop MWPP programs. Several existing EPA funding sources have been identified to assist States in MWPP developmental efforts. These authorities are dis-

cussed briefly below, and fiscal year 1991 funding levels are also provided. States and Regional Offices will need to negotiate use of these funds during the workplan development process.

Section 104(g) funds: Provide onsite assistance to help small facilities with compliance problems. Onsite assistance can include MWPP activities intended to promote long-term compliance, such as assistance with long-range capital planning, reviews of user-charge systems, development of self-auditing systems, and utility management training. Section 104(g) funds are generally used to support ongoing operational activities. FY 1991 funding level: \$2,050.0 K

Section 106 funds: Supplement State resources for water pollution control programs. Funding can include MWPP activities involving permit issuance, enforcement, water quality monitoring, water quality planning and standards, wasteload allocations, ground-water programs, pretreatment, oil and hazardous materials spill response, and general program management. Section 106 funds can be used to support MWPP program development activities or ongoing operational activities, including those associated with MWPP. FY 1991 funding level: \$81,700.0 K

Section 205(g) funds: Cover costs of managing delegated responsibilities under sections 201, 203, 204, and 212 of the CWA, i.e., the wastewater construction grants program. In addition, 205(g) provides authority to States to cover costs associated with administering an approved program under section 402 (i.e., implementation of MWPP through the NPDES permit program), or a State-wide waste treatment management planning program under section 208(b)(4). Section 205(g) funds may be used to support ongoing operational activities only, including those associated with MWPP.

Funding under section 205(g) has been authorized through any fiscal year ending before October 1, 1994; Congress has not appropriated new

money for these purposes in FY 1991. Some States have funds available from previous years under section 205(g).

Sections 205(j) and 604(b) funds: Support MWPP management activities in water quality management planning. This set of activities could include MWPP tasks associated with determining and reporting the nature, extent, and causes of water quality problems in various areas of the State and interstate region. Sections 205(j) and 604(b) funds may not be used for program implementation activities. FY 1991 604(b) funding level: approximately \$20.4 M

POTENTIAL FEDERAL FUNDING SOURCES

The following new sources of federal funding can be used to support the MWPP program.

Section 104(b)(3) funds: Support grants or cooperative agreements to finance the development of a wide range of programs relating to the causes, effects, extent, prevention, reduction, and elimination of pollution. These developmental activities apply directly to MWPP programs. Funds can be used to conduct special activities, demonstrations, training and studies in such areas as permitting and enforcement, sludge management, water quality standards, and water quality monitoring. Section 104(b)(3) funds cannot be used to support ongoing operational activities. A portion (\$500.0 K) of the FY 1991 funding has been reserved specifically for MWPP pilot grants (as described below). FY 1991 funding level: \$16,500.0 K

MWPP National Pilot Program Grants: The Office of Water, in cooperation with the Office of Pollution Prevention (OPP), plans to enter into cooperative agreements with selected States during FY 1991 to provide funding for MWPP pilot programs. Awards will be made to States. Certain matching fund requirements may apply. EPA is

preparing separate guidance for the Regions on MWPP pilot grants which will discuss award criteria, the grants process and matching funds. FY 1991 funding levels: \$500.0 K from OPP for source reduction projects; \$500.0 K from OW (reserved from section 104(b)(3) monies) for MWPP program development and start-up

ALTERNATIVE FUNDING MECHANISMS

In addition to the grant funds discussed above, States may also want to consider other funding sources for development and implementation of their MWPP activities. As part of the State Funding Study, the Agency has been working with the States over the last several years to identify other techniques which States might be able to use to raise funds to manage State programs. Some of these options collectively have been termed "alternative funding mechanisms" (AFMs).

AFMs may include a variety of approaches, but can generally be grouped into four categories: (1) fees, (2) taxes, (3) fines and penalties, and (4) other. EPA publications which provide a good overview of the current and potential applicability of AFMs include "State Use of Alternative Financing Mechanisms in Environmental Programs" and "Discussion Paper on Alternative Financing Mechanisms for State Water Programs". In addition, the Agency is establishing an Environmental Financing Information Network (EFIN) which will assist States in accessing materials relating to AFMs for State program management. EFIN will include additional materials including State specific discussions of the use of AFMs. EFIN should be accessible to the States in mid FY 1991.

Many States have already instituted AFMs for a variety of environmental programs. There are opportunities for expanding the application of these techniques to other programs and to other States. The most common AFM approaches are outlined below:

MWPP GUIDANCE

Fees

- Permit issuance (e.g., NPDES, facility installation, review of proposed development)
- Services (e.g., inspections, monitoring)
- User charges (e.g., surcharge on wastewater and/or solid waste disposal fees, hunting/boating licenses, access to recreation areas)
- Impact charges (e.g., wastewater service surcharge based on toxicity, urban development impact fee)

Taxes

- Commodity (i.e., special tax on certain materials which contribute to water quality problems, e.g., selected pesticides and chemicals)
- Special dedicated funds (e.g., mineral extraction tax, excise tax (e.g., boats, cigarettes, hotel/motel))
- Real estate (e.g., transfer tax, environmental review fees)
- Sales, income, property (particularly if portion is dedicated for water quality programs)

Fines and Penalties

- As authorized for violations of environmental requirements; more useful as a deterrent rather than as a reliable funding source

IV. EPA'S ROLES AND RESPONSIBILITIES

IN APPROVED NPDES STATES

EPA will undertake an active program to generate State and local support for MWPP. EPA will

assist the Regions in conducting workshops for interested parties and provide training for plant operators. The following paragraphs describe what we believe to be the appropriate roles and responsibilities for EPA.

EPA believes that MWPP is a logical and necessary evolutionary step in the management of municipal wastewater treatment facilities. Therefore, EPA will continue to urge States to develop and implement MWPP programs, although States will have the flexibility to determine whether to implement such a program and how to design their programs. EPA will coordinate the identification and use of appropriate forums to discuss MWPP and generate a broad base of support for the initiative. A communication strategy, which identifies key constituencies (e.g., local elected officials, city managers, treatment plant operators, industry associations, etc.), has been developed. EPA will continue to work with the States in carrying out this strategy.

EPA will provide support in a variety of ways to States in developing and implementing their programs. Among these are:

- EPA will gather information on MWPP practices and experiences and make it generally available.
- EPA will prepare brochures and other support material for the use of Regions and States in developing programs and in working with POTWs to implement programs.
- EPA staff will provide advice and technical assistance to States in developing and implementing MWPP programs.
- EPA will make available information on potential sources of funding for MWPP programs.

- EPA will make a limited number of incentive grants from those funding sources described above to foster the development of State pilot programs.
- EPA will fund State operator training programs.

EPA will gather periodic information about the status and performance of State-based municipal pollution prevention programs. EPA will obtain the necessary information through its existing oversight of State activities. To assess progress, qualitative measures may be included in the Office of Water Accountability System.

IN NON-APPROVED NPDES STATES

In States where responsibility for the NPDES permit program still rests with EPA, the cognizant EPA Region will be responsible for developing and implementing MWPP programs. However, Non-NPDES States are encouraged to participate in this program. The Region will use its discretion to tailor a flexible program that meshes with the State's legal authorities and preferences.

Programs for Non-NPDES States will include the components described in Section II of this Guidance: early warning systems with periodic self-audits, a reporting mechanism, corrective actions, tracking systems, and a process for program evaluation. EPA will support the objectives of the program through all appropriate means including NPDES permits. Programs for Non-NPDES States will be developed and the workshop/training effort will be initiated in FY 1991.

MUNICIPAL WATER POLLUTION PREVENTION (MWPP)

APPENDICES

**Prepared by the Office of Municipal Pollution Control
and the Office of Water Enforcement and Permits**

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MUNICIPAL WATER POLLUTION PREVENTION (MWPP)

APPENDIX A

National Summary of Workshop Findings

MWPP WORKSHOP SUMMARY

Should there be an MWPP Program?

- States generally reacted favorably to the MWPP concept.
- Several States (in 4 of the 10 Regions) acknowledged that many of the MWPP components are already in place. These pieces, however, may not be well-integrated to form a cohesive and comprehensive program.

Should the Program be Voluntary or Mandatory?

- The States were unanimous in wanting the MWPP program to be voluntary, with maximum flexibility for the States to design their own programs.
- States in half of the Regions felt that the MWPP program should be mandatory for POTWs. States in 2 Regions thought that the program should be voluntary for POTWs.

What Universe Should be Addressed?

- Almost all of the States (9 out of 10 Regions) agreed that the program should address both majors and minors. Several States emphasized that minors oftentimes present the worst problems.
- There was varied opinion, however, on who should be addressed first. States in Regions I and II would prefer to phase in majors first. In contrast, States in Region X would address smaller facilities first.

Should there be Uniform National Indicators?

- Except for the States in Regions VI and VIII, where there was no answer, all of the remaining States were unanimous in wanting flexibility to develop their own indicators.

Should the Program be Oriented Towards Technical Assistance or Enforcement?

- States in 5 of the Regions showed greater preference for technical assistance.
- However, almost all of the States recognized the need for both elements in the MWPP program.

What should be the Focus of Enforcement?

- States in only two of the ten Regions would use enforcement before effluent violations occurred.
- The remaining States believe that it would be difficult to enforce before there were effluent violations.

MWPP WORKSHOP SUMMARY

What should be the Focus of Enforcement (continued)?

- These States would prefer to use other tools to enforce MWPP, e.g., sewer bans, TAP ban, or provide special incentives such as a discounted interest rate for SRF loans.

What are the Resource Implications?

- States in 4 of the 10 Regions responded that it will take at least 1-2 FTE to get the program started. Other estimates ranged from 1-6 FTE.
- States in half of the Regions stressed that the resource demands will vary by size and scope of State program, and that it is difficult to assess.
- States in only two of the Regions believed that there may be some future resource savings as a result of reduced enforcement efforts.

What are Possible Funding Sources?

- States in only 4 Regions provided a response, stating that possible funding sources include:
 - pilot project grants
 - SRF
 - 4% set-aside
 - 205(g)
 - 104(g)
 - permit fees
- All of the remaining States raised serious questions concerning possible funding sources and eligibility of MWPP under SRF.

What Incentives Are Available to Encourage State Participation?

- The number one incentive is increased funding.
- In addition, States in 7 of the 10 Regions recommended that EPA and the States develop strong selling programs through workshops and information/technology transfer. They also emphasized the need for extensive public participation and public involvement in the development and selling of this program.

What are Realistic Time Frames for Implementation?

- For States in 6 of the 10 Regions, estimates to initiate the MWPP program range from 1-3 years.
- For States in 3 Regions, the programs could be fully operational within 7 years.

MWPP WORKSHOP SUMMARY

What are Appropriate EPA Roles in Supporting the MWPP Program?

- The majority of States (7 from 10 Regions) agreed that EPA should provide examples of MWPP models and indicators, which the States would then modify to fit their own needs.
- States from 4 Regions also recommended that EPA act as a national information clearinghouse and provide technology transfer, as necessary.

Municipal Water Pollution Prevention Workshop Issue Summary (continued)

Issues	Regions 1&11	Region 111	Region 1V	Region V	Region VI	Region VII	Region VIII	Region IX	Region X
What are the resource implications?	2-4 FTEs; 2 FTE initially and 2-4 FTE to maintain; will vary by size of State and program.	1-4 FTEs; savings possible due to less enforcement; State-specific and dependent upon intensity of effort.	Administrative costs are not high; States will have to divert resources from other programs over short-run.	Expanded program will require additional resources.	Increased resource demand to get program running (2-3 years); eventual stabilization and possibly a decrease in resource demand.	A lot!	Varies by State and scope of program; no on funds means no program.	Depends on program structure; voluntary has minimal resource implications.	No consensus; depends on structure of program; 1-5 FTEs (estimation).
What are possible funding sources?	EPA pilot project grants; HQs fund program guidance; 100(g); contract funds.	SRF funds; 4% set-aside; 205 (g) and 106 funds; permit fees and State appropriations.	SRF funds; 4% set-aside; 205(g); permit fees and State appropriations.	no answer	EPA should delineate eligible sources; States should establish priority funding for compliant facilities.	Resources are big issue and questions whether EPA will provide 106 set-sides, MR 4% SRF Rd? EPA contract funds?	no answer	Uncertain; is it SRF fundable?	Depends on whether program is voluntary or mandatory; SRF is not a good source.
What incentives are available to encourage State participation?	Funding! Sell program to local officials; extensive public involvement up front; reduce enforcement and emphasize MWPP.	Develop strong out-reach program; promote public involvement; EPA should develop national policy statement.	Funding; support for State's selling program; provide incentives for States that participate early on.	Funding! Seed money.	EPA should allow States to amend work plans and grant commitments; focus on new priorities.	Really need to sell to dischargers.	Money; low interest rate loans; allow State to design program.	States are already involved; more training opportunities; workshops increased incentives.	Money; allow States to create own program; workshops; extensive public participation process; technical assistance.
What are realistic time frames for implementation?	Varies by State; range from 2-10 years to generate support within State and begin implementation.	Deadlines not needed; give States chance to develop own time tables.	Range from 1-7 years.	no answer	2 years to start; fully operable in 6 years.	Except for Missouri implementation will take 1-2 years.	Dependent on available resources and scope of program; up to 6 years (12-16 months to initiate).	Difficult to determine; States have already started; it's a continuous process; depends on profile of program.	1 - 3 years (estimate); must be a grass root implementation process.
Roles for EPA	Provide examples of early warning/pilot system for States to modify. Program components and guidance developed at national level.	EPA provide model and function as national clearing-house; States decide which part of model fits their needs.	EPA develop model with thresholds; States adapt model to their own needs.	Generate list of ideas for program elements; set up national steering committee; HQs acts as facilitator.	Develop national policy statement; encourage program flexibility; public education.	Develop examples of MWPP; not guidance. Identify program impact and need for CWA amendments. MWPP effort must remain discretionary.	Provide technology assistance and transfer; respect State decisions; recognize that State programs may be enough.	Provide different model warning systems; various scenarios; try to get ASWIPCA involved; EPA must be flexible.	Keep program flexible; minimal tracking at national level; EPA should sell program; a Federal/State partnership.

Municipal Water Pollution Prevention Workshop Issue Summary

Issues	Regions I & II	Region III	Region IV	Region V	Region VI	Region VII	Region VIII	Region IX	Region X
Should there be an MWPP program?	Liked the concept.	Strongly support MWPP.	Program is promising.	Yes; most of the elements of MWPP are already in place.	Support concept; pilot programs being conducted in LA, TX, and NM.	Yes; States are doing most of the WI program already.	Yes; program must be flexible and State-specific.	Support ideas, but pollution prevention is goal of existing State programs; priorities need to set.	Yes; many places already exist in the States.
Should the program be voluntary or mandatory?									
STATES?	Voluntary; provide flexibility for States to develop own program.	Voluntary	Voluntary at first; mandatory later if necessary.	Voluntary; programs should be State-specific.	Voluntary; any statute should read "may" not "shall".	Voluntary; flexibility achieves results; do not just count beans.	Voluntary	Voluntary	Voluntary
POTW's?	Voluntary	Mandatory	no answer	Mandatory; but public support should be established first.	Mandatory	Voluntary	Mandatory; one State believed region should prepare report.	no answer	Mandatory
What universes should be addressed?	Phase-in majors first; then all POTW's.	All major and minors.	Majors and minors, but leave decision up to states.	Majors and minors; minors need more emphasis.	All POTW's; minors are the biggest concern.	no answer	If mandatory, majors; if voluntary, majors and minors; emphasis on minors and mechanical plants.	Any facility that treats domestic sewage; not just municipals.	Smaller facilities first; most sensitive resolving areas first; let States decide.
Should there be uniform national indicators?	Allow each State to develop own set of indicators chosen from national list.	States should design their own program.	Allow States to develop own indicators.	States should develop indicators; national guidance should be informational only.	no answer	All aspects of program should be voluntary.	no answer	States should have flexibility to develop critical indicators.	Flexibility in key.
Should the program be oriented towards technical assistance or enforcement?	Objective is compliance maintenance proactive program; not an enforcement program.	No consensus; prefer a technical assistance program, but recognize enforcement is needed.	Technical assistance; especially training; enforcement will still be required.	no answer	Provision in permit for technical evaluation of sewerage system.	Technical assistance	Not just enforcement; a mix of technical experience and enforcement.	A sliding scale; elements of both.	Could be either or both; leave decision to States; add financial assistance.
What should be the focus of enforcement?	Do not use report for enforcement; MWPP can be enforced using both outside of permit.	States should pursue enforcement before effluent violations; in practice, enforcement will probably follow violations.	Effluent violations	no answer	Emphasize enforcement of effluent violations; also need ability to enforce before violations occur.	no answer	Focus on violations; difficult to enforce beforehand; use TAP ban and discounted interest rates as incentives.	Varies by State; other actions (sewer bans, etc.) are also useful.	Could be either or both; leave decision to States.

Municipal Water Pollution Prevention Workshop Issue Summary (continued)

Issues	Regions I&II	Region III	Region IV	Region V	Region VI	Region VII	Region VIII	Region IX	Region X
What are the resource implications?	2-6 FTEs; 2 FTE initially and 2-4 FTE to maintain; will vary by size of State and program.	1-4 FTEs; savings possible due to less enforcement; State-specific and dependent upon intensity of effort.	Administrative costs are not high; States will have to divert resources from other programs over short-run.	Expanded program will require additional resources.	Increased resource demand to get program running (2-3 years); eventual stabilization and possibly a decrease in resource demand.	A lot	Varies by State and scope of program; no on funds means no program.	Depends on program structure; voluntary has minimal resource implications.	No consensus; depends on structure of program; 1-5 FTEs (estimation).
What are possible funding sources?	EPA pilot project grants; HQs fund program guidance; 104(g); contract funds.	SRF funds; 4% set-aside; 205 (g) and 106 funds; permit fees and State appropriations.	SRF funds; 4% set-aside; 205(g); permit fees and State appropriations.	no answer	EPA should delineate eligible sources; States should establish priority funding for compliant facilities.	Resources are big issue and question whether EPA will provide 106 set-sides, 104 4% SRF aid? EPA contract funds?	no answer	Uncertain; is it SRF fundable?	Depends on whether program is voluntary or mandatory; SRF is not a good source.
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What are realistic time frames for implementation?	Varies by State; range from 2-10 years to generate support within State and begin implementation.	Deadlines not needed; give States chance to develop own time tables.	Range from 1-7 years.	no answer	2 years to start; fully operable in 4 years.	Except for Missouri implementation will take 1-2 years.	Dependent on available resources and scope of program; up to 6 years (12-16 months to initiate).	Difficult to determine; States have already started; it's a continuous process; depends on profile of program.	1-3 years (estimate); must be a grass root implementation process.
Notes for EPA	Provide examples of early warning/pilot system for States to modify. Program components and guidance developed at national level.	EPA provide model and function as national clearing-house; States decide which part of model fits their needs.	EPA develop model with thresholds; States adapt model to their own needs.	Generate list of ideas for program elements; set up national steering committee; HQs acts as facilitator.	Develop national policy statement; encourage program flexibility; public education.	Develop examples of MWPP; not guidance. Identify program impact and need for CWA amendments. MWPP effort must remain discretionary.	Provide technology assistance and transfer; respect State decisions; recognize that State programs may be enough.	Provide different model warning systems; various scenarios; try to get ASWIPCA involved; EPA must be flexible.	Keep program flexible; minimal tracking at national level; EPA should sell program; a Federal/State partnership.

MUNICIPAL WATER POLLUTION PREVENTION (MWPP)

APPENDIX B

State Case Studies

STATE CASE STUDIES APPENDIX B

APPENDIX B: State Case Studies

INTRODUCTION

This appendix contains case studies of three innovative MWPP programs: the Wisconsin Compliance Monitoring Program, the Texas 75-90% Program, and the New Mexico IMPAC Program. Each case study presents the history of the State's program, how the program was planned and developed, and how the program operates. All of the case studies also include a section about the types of resources (personnel, funds, equipment) which the program requires.

By including these examples in the guidance document, it is hoped that other States will better understand how all the elements of a MWPP program can operate to form a comprehensive program suited to the individual needs and resources of the State. The case studies are also included to provide model elements which other States may be able to incorporate into their own State programs.

Exhibits following each case study provide even more detailed information on the State programs. Exhibits include excerpts from the State administrative codes, examples of questionnaires and other materials sent to POTWs, and examples of State data tracking reports.

WISCONSIN

WISCONSIN

PROGRAM OBJECTIVES

During the last decade in Wisconsin, billions of dollars in Federal (EPA Construction Grants), State (the Wisconsin Fund Program), and local monies were spent to upgrade wastewater facilities to achieve the water quality standards established in the 1972 Federal Clean Water Act. As a result of this major sewerage system construction program, approximately 95% of Wisconsin's municipalities are now in compliance with their Wisconsin Pollution Discharge Elimination System (WPDES) discharge permits. However, it is not sufficient to merely construct adequate wastewater facilities; these facilities must be operated and maintained in a manner that maximizes the design life of the facility. It is essential that communities begin planning for system replacement or addition on a timely basis so that effluent limits do not violate the State's water quality. It is also important for municipalities to have preventative programs in place for all communities to maintain standards over the lifetime of their wastewater facilities.

To accomplish these goals, the Wisconsin Department of Natural Resources (WDNR) designed and developed the Compliance Maintenance (CM) Program (Exhibit 1). The CM Program is intended to protect the investment and to insure that action is taken before violations of permit limits and water quality degradation occurs. The four major goals of the Wisconsin CM Program are:

- to prevent violations of effluent discharge limits by municipal wastewater treatment facilities;
- to promote awareness of wastewater management responsibilities of elected municipal officials by increasing their communication with wastewater treatment facility operators;

- to encourage and require, if necessary, municipalities to initiate operational improvements and design and construction of new or upgraded facilities before violations or the resultant water quality degradation occurs; and
- to maximize the useful life of municipal wastewater treatment facilities.

The most difficult obstacle in implementing CM in the State of Wisconsin was the public attitude that wastewater treatment is a costly and messy problem. The capital cost of building a new sewage treatment plant can be the largest expenditure that a municipality will face. Because these costs are often unexpected and do not appear to increase property values within corporate boundaries, wastewater treatment is a controversial, repugnant and certainly costly subject for elected officials to discuss. In order for the CM to be implemented successfully, WDNR had to change public attitudes regarding municipal wastewater treatment.

PUBLIC OUTREACH

By asking those to be regulated by the program to participate in building it, WDNR obtained broad support for the concept and for the partnership it reflects. WDNR undertook a two year public participation program which allowed all participants of the Compliance Maintenance Program the opportunity to become comfortable with the program specifics before implementation. In 1985, the WDNR conducted 22 workshops on the CM Program involving local environmental organizations and municipal officials, including elected officials, sewage treatment plant operators and public works personnel. After the workshops introduced the program, four formal public hearings in 1986 addressed the concerns or comments. Conclusions from the CM Program workshops included:

- continuous planning to prevent violations is needed;

- depreciation accounts for upgrading of wastewater treatment facilities is needed;
- the relationship of the CM Program to permitting is uncertain;
- grants/loans should be made to non-violators; and
- a technical advisory committee (TAC), represented by State and local officials, should be appointed to develop CM Program.

In 1986, a 19-person TAC was formed from the regulated community to steer the program initiative. This committee included wastewater operators, municipal officials, consulting engineers, an environmental group member, a representative of the Department of Justice and WDNR staff members. The TAC's objectives included refining the results of the public workshops, the codifying of a compliance maintenance policy, and the recommending of a number of improvements to the wastewater treatment program. The TAC developed a Compliance Maintenance Annual Report (CMAR) that all publicly-owned treatment works (POTW) operators prepare and submit, through the local governing body, to the State. Training sessions to instruct the operators on how to complete the CMARs were held in 1987. This effort to keep the regulated public informed of the policy as it developed won widespread support and acceptance of the CM Program.

COMPLIANCE MAINTENANCE PROGRAM DESIGN

The Compliance Maintenance Annual Report or CMAR is the cornerstone of the Wisconsin Compliance Maintenance Program (Exhibit 2). The CMAR is a product of the Natural Resources Code Chapter 208, which outlines the Compliance Maintenance Program. The purpose of this report is to document "indicators" of future effluent violations. The CMAR is submitted annually by all municipalities

and is used as a simple, objective analysis of their treatment system. The CMAR documents the performance and condition of the wastewater utility to WDNR, local government elected officials, and operators.

The treatment plant operator completes the CMAR with the previous year's data and monitoring information (i.e., 1989's POTW information will be 1990's CMAR) and forwards the completed CMAR to the chair of the local governing board (the owner). The governing board reviews the completed CMAR which the operator submitted.

The board, then, must pass a resolution documenting and acknowledging the review of the CMAR and indicating the corrective actions, if any, that will be taken to prevent effluent violations. Proposed actions should address areas where maximum or close to maximum points were generated in the CMAR. This resolution should contain any other information the governing board deems necessary. After the governing board's final action, the completed CMAR is returned to the operator with a resolution attached. The operator, in turn, must submit the completed CMAR and accompanying resolution by March 31 of the given year to the local WDNR District office.

The CMAR contains sections that objectively inquire about the condition, quality, and capacity of the treatment system. The responses from these sections generate points in order to evaluate the system. Other sections do not generate points but subjectively produce self-evaluative information regarding the treatment system's financial status and operations. This subjective evaluation of the facility is intended to inform elected officials of the ability of the wastewater treatment system to meet permit limits in the future.

The CMAR's point total determines if the municipality should begin extensive planning and construction of new facilities, modify existing systems to avoid effluent violations, or undertake no

correctional activities. The higher the number of points generated, the more likely the community should begin evaluating their system to determine the improvements that are necessary to prevent effluent violations. The maximum point total is 400 points. Points are generated for the following treatment characteristics:

- effluent quality and plant performance [0-100], an important indicator of the efficiency of the facility in regard to water quality;
- influent flow and BOD (biochemical oxygen demand) loading in comparison to design [0-80], indicator of volume and amount of wastes entering wastewater system;
- age [0-40], another probable indicator of the efficiency of the treatment facility;
- bypass and overflow occurrences [0-50], an indicator related to efficient design of overall wastewater system;
- anticipated community growth [0-20], an important indicator for future planning and design;
- sludge storage and disposal capacity [0-100], a good indicator of the design efficiency of the system; and
- operator certification and education [0-20], an important indicator about the level of formal training in treatment processes.

The point total corresponds with response levels, at which certain actions need to be taken. The owner may submit an explanation of the assumptions that were used in rating the items and determining point values contained in the completed CMAR.

The following are the ranges and point totals that indicate the actions to be taken: 1) Voluntary Range; 2) Departmental Recommendation Range; and 3) Departmental Action Range. In the Voluntary Range (0-70), the owner evaluates and implements tasks voluntarily to correct the identified problems in the CMAR, if any. The owner may initiate longer range planning for new, upgraded, or additional treatment facilities. In the Departmental Recommendation Range (71-120), the WDNR notifies the owner of the treatment facility that an operation and needs review (ONR) is recommended. An ONR evaluates the treatment system's ability to maintain effluent limits over the next five years, focusing on specific problem area(s) and offers solutions to those problems. If the problem is serious, that is, if the CMAR indicates that the existing system is not capable of providing adequate wastewater treatment in the next five years, a facility plan is then also recommended. The scope of a facility plan is based on individual point totals for each information item identified in the ONR and usually requires that a workplan be submitted.

In the Departmental Action Range (121-400), the wastewater facility owner is required to complete an ONR within a certain time period prescribed by WDNR. Part of the ONR will consist of a workplan that lists all necessary actions and time schedules for the treatment system to maintain effluent limits. A facility plan may be required if WDNR determines that consistent future compliance with effluent limitations will not result from improved system operation, maintenance, and efficiency or that growth within areas served by the owner's sewerage system jeopardizes future compliance. If necessary, WDNR may modify the owner's WPDES permit to require one or more of the above reports.

ENFORCEMENT

In the past, municipalities that violated wastewater treatment standards received the greatest attention from regulators, and enforcement actions were taken only after the laws were violated. Previous State and Federal regulations clearly sent a message to the municipality to take action only after the problem occurred. Most State regulators, community leaders and wastewater operators were comfortable with this approach. During the 1970's and early 1980's, the existing regulations and grant programs brought many municipalities into conformance with their permits. However, this policy contained little incentive to maintain permit compliance. Therefore, a major objective of the public participation program was to convince the participants in the present system to change their thinking to a more preventive approach. The CM Program is different from other programs in that it completely shifts Wisconsin's wastewater management program from a reactive approach to a proactive one. CM requires municipalities to continuously evaluate their system capability and begin formal planning, design, and construction to prevent violations and associated enforcement actions. Also, a State task force had made a preliminary recommendation that Wisconsin's state revolving fund award first priority to municipalities that act before violations occur. The idea to make grants/loans available to non-violators was an important recommendation from the CM workshops.

In the past, Wisconsin only awarded construction grants to those facilities in violation of the Clean Water Act. The U.S. EPA construction grant program is phasing out, therefore, Wisconsin is beginning its first year (1990) of adopting a low interest loan program for the funding of their wastewater treatment facilities. This innovative funding feature rewards facilities that maintain good compliance records with reduced interest loans. Wisconsin is incorporating two unique provisions for low interest loans to facilities that have a non-compliant status. The first provision provides low interest loans to facilities with economic hardships. This provision involves increasing the funding available to a facility based on a financial trigger point that decides the optimum interest rate of the loan to the facility. This interest rate

of the loan can be as low as zero percent. Also under this provision, the WDNR is permitted to transfer available funds into grant money that can result in the facility receiving up to 90% of the funding required for necessary improvements.

The other unique provision in Wisconsin's low interest loan program is to provide for unexpected events or occurrences that are beyond control of the facility's standard operation such as weather-related events or mechanical failure. However, the availability of a low interest loan in this provision is closely associated with the facility's recent CMAR recommendations made by the WDNR.

Involvement in the CM Program does not shield a facility or municipality from enforcement actions by WDNR; however, more concentration is placed on gross or substantial violations. Most facility violations are not addressed through the CM Program, but instead through the State's existing permit actions or enforcement program. The owners (i.e., the municipal board or utility board which governs POTWs or the management board which governs a private treatment system) must review the CMAR and formulate any necessary corrective actions to solve any shortcomings of the system. Failure of the operator-in-charge to complete and submit a CMAR may result in a maximum forfeiture of \$10,000 per day of violation. Failure of the municipality to file a CMAR could result in a \$15,000 penalty for the municipality in which the facility is located. Such fines encourage treatment plant owners and elected officials to become involved with the issues faced by POTW operators.

RESOURCE INFORMATION

Initially, Federal, State, and local monies were spent to upgrade the wastewater facilities in Wisconsin. And while available money for facility upgrades has been decreasing, water resources are a high priority in Wisconsin and receive a great deal of support from elected officials. Elected officials have supported the idea of CM funding coming from an environmental fee program, which requires each

discharge permit holder in the State to pay a fee to support WDNR. The WDNR also received partial budgetary assistance from EPA for initiation of the Program through funding provided under Section 106 of the Clean Water Act.

Normally, there are over 100 FTEs to implement wastewater programs throughout the State. However, the first year of the CM Program required six to seven additional FTEs, although this figure is declining over time. The CM Program does require, for actual maintenance, approximately three FTEs at each field office (6 District offices and 15 Area offices), which are funded under the State permit fee.

PROGRAM MANAGEMENT

The WDNR manages the CM Program for approximately 650 municipalities throughout Wisconsin. WDNR staff and Area Engineers provide technical assistance to the facilities. They also conduct inspections and carry out any enforcement actions. The strong management system and the good field staff have both contributed to the success of the program. The CM Program has become a means of enhancing communications. Its an early warning system for the operators as well as the regulators.

The WDNR has always tracked loadings, but the CMAR puts data in an accessible format and creates a forum for review. In the interest of maintaining and improving open communication with the operators, WDNR wanted to convey the importance of the point totals. Therefore, every year a statewide summary of CMAR point data for all municipalities is published (Exhibit 3). This summary is considered public information for all communities to inspect. WDNR has begun to utilize the data from the summary to try to plot trends within a given community. WDNR will track changes over time for each community in the State to see if compliance with the CM Program is improving the ability of each municipality to meet water quality standards.

In conclusion, the CM Program provides municipal officials with an early warning system for evaluating their plant's capabilities. The wastewater operator completes the annual report on the facility which is then passed to elected officials prior to submittal to the WDNR. This approach to government is unique. CM does not wait for problems to manifest themselves, but influences municipalities to act as partners with the State in the protection of water quality.

For more information on Wisconsin's Compliance Maintenance Program, contact:

**Mr. Chuck Burney
Program Manager
(608) 266-2304**

EXHIBIT 1

Chapter NR 208

COMPLIANCE MAINTENANCE

NR 208.01	Purpose	NR 208.05	Compliance maintenance point system
NR 208.02	Applicability	NR 208.06	Review of CMAR
NR 208.03	Definitions	NR 208.07	Actions required to maintain compliance
NR 208.04	Compliance maintenance annual report		

NR 208.01 Purpose. This chapter implements ch. 147, Stats., and encourages and, where necessary, requires owners of publicly owned treatment works and privately owned domestic sewage treatment works to take necessary actions to avoid water quality degradation and prevent violations of WPDES permit effluent limits. This chapter encourages actions which promote the owner's awareness and responsibility for wastewater treatment needs, maximize the useful life of sewerage systems through improved operation and maintenance and initiate formal planning, design and construction to prevent effluent violations.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

NR 208.02 Applicability. This chapter applies to owners of publicly owned treatment works and privately owned domestic sewage treatment works.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

NR 208.03 Definitions. In addition to the definitions and abbreviations in chs. NR 110, 114, 205, 206 and 210, and ch. 147, Stats., the following definitions apply to terms in this chapter.

(1) "Compliance maintenance annual report" or "CMAR" means a report which the owner of a treatment works submits to the department to describe the physical conditions and the performance of the owner's sewerage system during the previous calendar year.

(2) "Facility plan" means a report which the owner of a treatment works submits to the department that consists of those necessary plans and studies directly relating to the construction of proposed sewage treatment facilities or additions to existing sewage treatment facilities where additional treatment capacity is proposed.

(3) "Operation and needs review" or "ONR" means a report which the owner of a treatment works submits to the department evaluating the ability of the sewerage system to maintain effluent limits over the next 5 years.

(4) "Work plan" means a list of all necessary actions and corresponding time schedule which is included in the facility plan or operation and needs review to ensure that an owner's sewerage system maintains effluent limits.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

NR 208.04 Compliance maintenance annual report. (1) **PURPOSE.** The compliance maintenance annual report describes the physical conditions and the performance of the sewerage system during the previous calendar year.

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dar year, and provides a treatment works owner with an objective analysis to determine whether a more detailed evaluation of the sewerage system shall be conducted. The owner and the department shall use the CMAR to identify needs for future planning actions. In conjunction with a point rating system, the CMAR shall determine whether sewerage system owners shall initiate actions to prevent effluent limit violations.

(2) **SUBMITTAL TIMING AND OTHER REQUIREMENTS.** The CMAR shall be submitted to the department on or before June 30, 1987. Thereafter, the CMAR shall be submitted to the department on or before March 31 of each subsequent year. The CMAR shall be based on information and monitoring data collected in the previous calendar year. A duly authorized representative of the owner shall complete and sign the CMAR.

(3) **RESOLUTION.** In the case of a publicly owned treatment works, a resolution from the municipality's governing body shall accompany the CMAR. The resolution shall include the following:

- (a) An acknowledgement that the governing body has reviewed the CMAR;
- (b) A description of actions which the owner will take to maintain compliance with effluent limitations; and
- (c) Any other information the governing body deems appropriate.

(4) **CONTENT.** The CMAR shall be submitted on forms provided by the department. The owner shall supply and analyze the following information:

- (a) Effluent quality and wastewater treatment facility performance;
- (b) Actual influent flow and BOD₅ loading to the wastewater treatment facility in relation to the design flows and design BOD₅ loadings for the facility;
- (c) Age of the wastewater treatment facilities;
- (d) The occurrence of bypasses and overflows in the sewerage system;
- (e) Anticipated new development;
- (f) Sludge storage and disposal capacity;
- (g) Financial status of the wastewater utility;
- (h) General physical condition of the facility;
- (i) Expected useful life of the facility;
- (j) Operator training and certification; and
- (k) Other information required by the department.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

NR 208.05 Compliance maintenance point system. (1) **PURPOSE.** The CMAR shall contain a point system component which is applied to all owners, to establish actions which promote effluent limit compliance, identify whether an owner shall take additional steps to maintain or improve existing sewerage system operations, and evaluate the condition of the sewerage system.

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(2) **RATINGS ITEMS.** On an annual basis, the owner shall calculate a point total T which is based on information provided by the owner in the CMAR. The point total T shall be determined with the following equation:

$T = (TBL + TQ + TBOD + TTSS + TAGE + TBYP + TBEF + TSTG + TSD + TND + TFD + TOC + TOT) \times EQ$ which is defined as follows:

(a) TBL, the point sum for monthly average BOD₅ mass loading in relation to the design BOD₅ loading, shall equal the sum of numbers appearing in Table 1 for monthly exceedances of 90% and 100% of design average BOD₅ loading in the previous calendar year.

Table 1

Point Assignments Related to Exceedances of a Percentage of Design BOD₅ Loadings in the Previous Calendar Year

Number of Months that a Percentage of Design BOD ₅ Loadings is Exceeded	Percent of Design BOD ₅ Loadings	
	90%	100%
0	0	0
1	0	10
2	5	20
3	5	30
4	5	40
5 or greater	10	50

(b) TQ, the point sum for monthly average volumetric flow in relation to design average volumetric flow, shall equal the sum of numbers appearing in Table 2 for monthly exceedances of 90% and 100% of design average volumetric flow in the previous calendar year.

Table 2

Point Assignments Related to the Exceedance of Percentages of Design Volumetric Flows in the Previous Calendar Year

Number of Months that a Percentage of Design Volumetric Flow is Exceeded	Percent of Design Flows	
	90%	100%
0	0	0
1	0	5
2	0	5
3	0	10
4	0	10
5 or greater	5	15

(c) TBOD, the point sum relating to the effluent limit for 5-day biochemical oxygen demand (BOD₅), shall equal the sum of numbers appearing in Table 3 for exceedances of 90% and 100% of the monthly average effluent limits contained in the WPDES permit. In the absence of monthly average effluent limits for BOD₅, weekly effluent limits shall be used in the calculation.

Table 3

**Point Assignments Related to the
Exceedance of Percentages of the BOD₅ Effluent Limit(s) in the Previous
Calendar Year**

Number of Months that a Percentage of the BOD ₅ Effluent Limit is Exceeded	Percent of BOD ₅ Effluent Limit	
	90%	100%
0	0	0
1	0	5
2	10	5
3	20	10
4	30	10
5 or greater	40	10

(d) TTSS, the point sum relating to the effluent limit for total suspended solids, shall equal the sum of numbers appearing in Table 4 for exceedances of 90% and 100% of the monthly average effluent limits contained in the WPDES permit. In the absence of monthly average effluent limits for total suspended solids, weekly effluent limits shall be used in the calculation. If no total suspended solids limit is included in the WPDES permit, TTSS shall equal 0.

Table 4

**Point Assignments Related to the Exceedance
of Percentages of the Total Suspended Solids Effluent Limit(s) in the
Previous Calendar Year**

Number of Months that a Percentage of the TSS Effluent Limit(s) is Exceeded	Percent of TSS Effluent Limit	
	90%	100%
0	0	0
1	0	5
2	10	5
3	20	10
4	30	10
5 or greater	40	10

(e) TAGE, the point sum relating to facility age, shall be the time period in years since the wastewater treatment facility was constructed or underwent major structural modification or major additions were placed in operation multiplied by the age factors contained in Table 5 associated with the type of sewage treatment plant indicated. Under this subsection TAGE may not be greater than 40.

Table 5

Point Assignments Associated to Facility Age

<u>Plant Type</u>	<u>Age Factor</u>
Stabilization Ponds	1.0
Aerated Lagoons	1.5
All other plants	2.0

(f) TBYP, the point sum relating to bypassing due to precipitation, shall be the number of calendar days that bypasses or overflows due to precipitation events occurred during the previous calendar year multiplied by 5. Under this subsection TBYP may not be greater than 25.

(g) TBEF, the point sum relating to bypassing due to equipment failure, shall be the number of calendar days that bypasses or overflows due to equipment failure occurred during the previous calendar year multiplied by 5. Under this subsection TBEF may not be greater than 25.

(h) TSTG, the point total associated with sludge storage capacity, shall be the number of points appearing on Table 6 relating to the sludge storage capacity of the owner's wastewater treatment facility and off site. For aerated lagoons and stabilization ponds, TSTG shall equal 0.

Table 6

Point Assignments Associated with Sludge Storage

<u>Sludge Storage Capacity</u>	<u>Point Total</u>
Less than one month	50
Less than 2 months and greater than or equal to one month	30
Less than 3 months and greater than or equal to 2 months	20
Less than 4 months but greater than or equal to 3 months	10
Greater than or equal to 4 months	0

(i) TSD, the point total associated with sludge disposal sites, shall be the number of points appearing on Table 7 relating to the adequacy of sludge disposal sites approved for use by the permittee. For aerated lagoons and stabilization ponds, TSD shall equal 0. For other facilities that do not discharge sludge on land, TSD shall equal 0.

Table 7

Point Assignments Associated with Sludge Disposal Practices

<u>Number of Months The Permittee Has Access to and Approval for Sufficient Land Disposal of Sludge</u>	<u>Point Total</u>
36 or more	0
Less than 36 and greater than or equal to 24	10
Less than 24 and greater than or equal to 12	20
Less than 12 and greater than or equal to 6	30
Less than 6	50

(j) TND, the point total associated with new development within the sewer service area of permittee, shall equal 10 points if new development has occurred over the last 12 months that will have a significant impact

on discharges to the permittee's sewerage system. Otherwise TND shall equal 0.

(k) TFD, the point total associated with future development within the sewer service area, shall equal 10 points if new development is likely to occur in the next 3 years that will result in a significant new discharge to the permittee's sewerage system. Otherwise TFD shall equal 0.

(l) TOC, the point total associated with operator certification, shall equal 0 points if the individual in direct responsible charge of the operation of the treatment plant is certified at the grade level required by s. NR 114.14, and 5 points if the chief operator is not certified at the grade level required by s. NR 114.14.

(m) TOT, the point total associated with operator training, shall equal 0 points if the individual in direct responsible charge of the operation of the treatment plant has completed greater than or equal to 12 hours of continuing education in the previous 2 calendar years. TOT shall equal 5 points if the chief operator has completed less than 12 hours of continuing education in the previous 2 calendar years.

(n) EQ, the factor that equalizes the point sum for different types of sewage treatment plants, shall be equal to 1.33 for aerated lagoons and stabilization ponds that discharge to surface waters, 1.60 for aerated lagoons and stabilization ponds that discharge to groundwater, 1.14 for all other sewage treatment plants that discharge to groundwater, and 1.00 for all other sewage treatment plants.

(3) **CALCULATION OF CMAR POINT TOTAL.** The CMAR shall include the procedure for calculating the point total of the items in sub. (2). The owner shall calculate T with the CMAR submittal. The owner may submit an explanation of the assumptions that were used in rating the items and determining point values contained in the completed CMAR.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

NR 208.06 Review of CMAR. (1) **DEPARTMENT REVIEW AND ACCEPTANCE.** The department shall review the CMAR and the point total contained in the CMAR for accuracy and completeness. The department shall notify the owner within 60 days of submittal whether the CMAR and the point total calculations are acceptable. In case of error, the department shall recalculate the point total and notify the owner of the corrected totals. The notification shall explain the corrections.

(2) **LEVELS OF OWNER AND DEPARTMENT RESPONSES.** When accepted point totals are within the following ranges, the department shall notify each owner of the range:

(a) *Voluntary range.* For point totals equal to or less than 70, the owner may evaluate and implement steps to address problems identified in the CMAR. The owner may initiate longer range planning for new, up-graded or additional treatment facilities.

(b) *Department recommendation range.* For point totals greater than 70 but less than or equal to 200 for all CMAR's submitted pursuant to the June 30, 1987 deadline, the department shall notify the owner that an operation and needs review is recommended. Thereafter, the department recommendation range shall be greater than 70 points and less than or equal to 120 points. A facility plan shall be recommended if the CMAR

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indicates the existing system is not capable of providing adequate wastewater treatment in the next 5 years.

(c) *Department action range.* For point totals greater than 200 for all CMAR's submitted pursuant to the June 30, 1987 deadline, the department shall require the owner to complete an operation and needs review within a time period which the department prescribes. Thereafter, the department action range shall be greater than 120 points. A facility plan shall be required if the department determines that consistent future compliance with effluent limitations will not result from improved system operation maintenance and efficiency or that growth within areas served by the owner's sewerage system jeopardizes future compliance. A work plan shall be submitted as a part of the facility plan or operations and needs review. If necessary, the department shall modify the owner's WPDES permit to require one or more of the referenced reports. All procedures used in the modification of a WPDES permit shall conform with requirements in ch. NR 203.

(3) **OWNER RESPONSE REQUIREMENTS.** The following are general requirements of the reports described below.

(a) *Operations and needs review.* The content and scope of the ONR shall be based on individual point totals for each information item identified in s. NR 208.05 (2). The ONR shall include an investigation of the sewerage system to determine whether improved operation, maintenance and efficiency of the existing facility will result in continued effluent limit compliance over the next 5 years. The ONR shall evaluate anticipated increases in discharges due to residential, commercial and industrial growth within the owner's sewer service area. The ONR may replace a facility plan for minor upgrading of sewerage systems.

(b) *Facility plan.* The scope of the facility plan shall be based on individual point totals for each information item identified in s. NR 208.05 (2) and upon the requirements of s. NR 110.09.

(c) *Work plan.* The owner shall submit a work plan as a part of the facility plan or the ONR. For a major upgrading program, the work plan shall be a schedule of all necessary planning, design and construction tasks for the new system. Work plans may also specify operational or pretreatment improvements for the sewerage system.

(4) **OTHER ACTIONS.** A permittee's CMAR does not preclude the department from taking actions necessary to ensure the permittee's compliance with chs. 29, 30, 31, 144 and 147, Stats.

(5) **REVISION OF POINT VALUES.** On or before November 1 of each year the department may revise the point ranges associated with each level of owner and department response in sub. (2). All owners shall be notified of the point total revisions on or before December 1. All CMARs submitted the following year shall be evaluated for response based on the revised point ranges. To revise the point ranges the department shall consider the previous year's point totals for all sewage treatment plants, statewide compliance with effluent limits, fiscal considerations, environmental impacts and other factors. The point ranges may be revised only after consultation with the following persons or organizations:

- (a) Municipal officials;
- (b) Owners of private domestic sewage treatment plants;

- (c) Sewage treatment plant operators;
- (d) The attorney general; and
- (e) Environmental organizations.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

NR 208.07 Actions required to maintain compliance. (1) REPORT SUBMITTAL REQUIREMENTS. All facility plans or operation and needs reviews shall be submitted to the department on a timely basis. For publicly owned treatment works, a resolution passed by the municipality's governing body shall accompany the facility plan or the operation and needs review. The resolution shall include:

- (a) An acknowledgement that the governing body has reviewed the report to be submitted;
- (b) An acknowledgement of the work plan which is contained in either the facility plan or operation and needs review, and description of actions the municipality may take to maintain compliance with effluent limits;
- (c) If necessary, a discussion of financial programs to be used to implement the work plan; and
- (d) Any other information the governing body deems appropriate.

(2) WORK PLAN REVIEW. Upon receipt of the facility plan or operation and needs review, the department shall review the report for assurance that effluent limits will not be violated during the term of the work plan. The department may require the owner to revise the reports or the work plan to prevent effluent limit violations.

(3) IMPLEMENTATION. It is the owner's responsibility to complete all tasks identified in the work plan to prevent effluent limit violations. The owner shall maintain the time schedule identified in the work plan.

(4) MODIFICATIONS TO THE WORK PLANS. (a) Work plan modifications shall be submitted to the department. The department may allow additional time to implement the work plan. Factors that the department shall consider in allowing additional time include the financial status of the community, the anticipated performance of the existing sewerage system, environmental consequences of the proposed time schedule change, and events over which the owner has little or no control.

(b) The department may not allow a work plan modification if it determines that the modification will result in significant effluent limit violations prior to the completion of the schedule. Under this section, owners may provide assurances to install temporary treatment facilities, improve operation, maintenance and efficiency to avoid effluent limit violations or to decrease commercial, industrial or residential loadings to the sewerage systems. Owners may also agree to restrict sewer extension installation prior to the completion of work included in the work plan.

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(5) **WPDES PERMIT.** The department may take action to modify the owner's WPDES permit to include the work plan or subsequent or necessary revisions to maintain compliance with effluent limitations.

Note: In general, WPDES permits may not be modified to include work plans for operational changes or for planning, design and construction programs that can be completed within one year.

History: Cr. Register, February, 1987, No. 374, eff. 3-1-87.

EXHIBIT 2

Compliance Maintenance Annual Report

Permit Name (Community): _____

Address: _____

County: _____

Permit Number: _____

Name and Title of Person Completing Form:

Date Completed: _____

COMPLIANCE MAINTENANCE ANNUAL REPORTS

Information Source List

You will need the following information to complete your compliance maintenance report which covers calendar year 1990 (due by March 31, 1991).

- Part 1 a. The average plant influent flow for each month (million gallons per day) in 1990.
- b. The average plant influent BOD for each month (mg/l and lb/day) in 1990.
- c. Your plant's average design flow (MGD) and design BOD loading (lbs/day).
- Part 2 a. The monthly average effluent BOD and TSS in mg/l for 1990.
- b. Your WPDES permit effluent limits for BOD and TSS in mg/l for 1990.
- Part 3 The age of your treatment plant defined as the number of years since the last major reconstruction to increase the organic or hydraulic capacity of the plant. The last calendar year (1990) minus the year the new construction was brought on-line.
- Part 4 Bypass and overflow information. This is the number of days in all of 1990 when there was a bypass or overflow of untreated wastewater due to heavy rain or snow melt, or due to equipment failure whether intentional or inadvertent from all collection systems tributary to this treatment facility.
- Part 5 If you landspread sludge, how many months of sludge storage does your plant have? This should include on-site and off-site storage from the treatment plant. The digester capacity may be used in the calculation.
- Part 6 How many approved land disposal sites for sludge do you have?
 How many months or years will these be available for use?
- Part 7 The number of sewer extensions which were installed in your community last year. You need to get the design population, design flow and design BOD for each sewer extension from your engineer.
- Part 9 The beginning (January 1, 1990) and the ending (December 31, 1990) balance of your plant's segregated equipment replacement fund. If this isn't available from the Treasurer, use 1989 data.

Instructions to the Operator-in-Charge

1. Complete all sections of the CMAR, to the best of your ability.
2. Parts 1 through 8 contain questions for which points will be generated. These points are intended to communicate to the Department and the governing body or owner what actions will be necessary to prevent effluent violations. Place the point totals from parts 1 through 8 on Page 10, the Point Calculation page.
3. Add up the point totals on page 10 and multiply by the correction factor indicated.
4. Submit the CMAR to the governing body or owner for their review and approval.
5. The governing body must pass a resolution which contains the following points. A private owner should address the following points in a letter.
 - a. The resolution or letter must acknowledge the governing body or owner has reviewed the CMAR.
 - b. The resolution or letter must indicate what actions, if any, will be taken to prevent effluent violations. Proposed actions should address where maximum or close to maximum points were generated in the CMAR.
 - c. The resolution or letter should provide any other information the governing body or owner deems appropriate.
6. The CMAR and the resolution or letter should be submitted or mailed by March 31, 1991 to the DNR District office listed on the letter which is attached to this report.

Completion of this form is mandatory. Failure to complete and submit this form may result in a maximum forfeiture of \$10,000 per day of violation pursuant to s. 147.21(2), Wis. Stats.

Part 1: Influent Loadings/Flow

A. List the average monthly volumetric flows and BOD₅ loadings received at your facility during the last calendar year.

<u>Month</u>	<u>Col. 1</u> <u>Average</u> <u>Monthly Flow</u> <u>(million gallons)</u> <u>per day (MGD)</u>	<u>Col. 2</u> <u>Average Monthly</u> <u>BOD₅</u> <u>Concentration</u> <u>(mg/l)</u>	<u>Col. 3</u> <u>Average Loading</u> <u>BOD₅ loading</u> <u>(pounds per day)**</u>
January	_____	_____	_____
February	_____	_____	_____
March	_____	_____	_____
April	_____	_____	_____
May	_____	_____	_____
June	_____	_____	_____
July	_____	_____	_____
August	_____	_____	_____
September	_____	_____	_____
October	_____	_____	_____
November	_____	_____	_____
December	_____	_____	_____

** BOD₅ loading = Average Monthly Flow (in MGD) x Average Monthly BOD₅ concentration (in mg/l) x 8.34.

B. List the average design flow and average design BOD₅ loading for your facility in the blanks below. If you are not aware of these design quantities, contact your consulting engineer or the Department of Natural Resources.

	<u>Ave. Design Flow</u>	<u>Ave. Design</u> <u>BOD₅ Loading</u>
Design Criteria:	_____	_____
90% of the Design Criteria:	_____	_____

C. How many times did the monthly flow (Col. 1) to the WTP exceed 90% of design flow? _____
(Circle the appropriate number)

0-4 = 0 points; 5 or more = 5 points

D. How many times did the monthly flow (Col. 1) to the WTP exceed the design flow? _____
(Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3-4 = 10 points; 5 or more = 15 points

E. How many times did the monthly BOD₅ loading (Col. 3) to the WTP exceed 90% of the design loading? _____
(Circle the appropriate number)

0-1 = 0 points; 2-4 = 5 points; 5 or more = 10 points

Facility Name: _____

- F. How many times did the monthly BOD₅ loading (Col. 3) to the WTP exceed the design loading?
_____ (Circle the appropriate number)

0 = 0 points; 1 = 10 points; 2 = 20 points; 3 = 30 points; 4 = 40 points;
5 or more = 50 points

- G. Add together each point value you circled for C through F and place this sum in the blank below.

C points = _____

D points = _____

E points = _____

F points = _____

TOTAL POINT VALUE FOR PART 1 _____

Enter this value on the calculation page at the back of the CMAR, page 10.

Part 2: Effluent Quality/Plant Performance

- A. List the average monthly effluent BOD₅ and TSS concentration produced by your facility during the last calendar year.

<u>Month</u>	<u>BOD₅ (mg/l)</u>	<u>TSS (mg/l)</u>
January	_____	_____
February	_____	_____
March	_____	_____
April	_____	_____
May	_____	_____
June	_____	_____
July	_____	_____
August	_____	_____
September	_____	_____
October	_____	_____
November	_____	_____
December	_____	_____

- B. List the monthly average permit limits for the facility in the blanks below. If monthly average limits are not contained in the permit, use the weekly averages listed in the permit. If no suspended solids limit exists, the total points for questions E and F will equal zero.

	<u>BOD₅ (mg/l)</u>	<u>TSS (mg/l)</u>
Permit Limit:	_____	_____
90% of the Permit Limit:	_____	_____

Facility Name: _____

- C. How many months did the effluent BOD₅ concentration exceed 90% of permit limits? _____
(Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points; 5 or more = 40 points

- D. How many months did the effluent BOD₅ concentration exceed permit limits? _____
(Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 10 points

- E. How many months did the effluent TSS concentration exceed 90% of permit limits? _____
(Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points; 5 or more = 40 points

- F. How many months did the effluent TSS concentration exceed permit limits? _____
(Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 10 points

- G. Add each point value circled for C through F and place in the blank below:

C points = _____

D points = _____

E points = _____

F points = _____

TOTAL POINT VALUE FOR PART 2 _____

Enter this total on the calculation page at the back of the CMAR, page 10.

Part 3: Age of the Wastewater Treatment Facilities

- A. What year was the wastewater treatment plant constructed or last reconstructed? _____

Subtract the above answer from 1990 to determine age:

Age = (Last calendar year) - (Answer to A.)

Age _____ = (1990) - (_____)

Enter Age in Part C., below.

- B. Check the type of treatment facility that is employed:

	<u>Factor</u>
_____ Mechanical Treatment Plant or Septic Tank/Sand Filter	2.0
_____ Aerated Lagoon	1.5
_____ Stabilization Pond	1.0

- C. Multiply the factor listed next to the type of facility your community employs by the age of your facility to determine the total point above value for Part 3:

TOTAL POINT = _____ X _____ = _____ points
VALUE FOR (Factor) (Age)
PART 3

If the point total exceeds 40 points, enter only 40 for the Part 3 total on page 10. Otherwise, enter the above value on the calculation page at the back of the CMAR, page 10.

Facility Name: _____

Part 4: Bypassing from Tributary Sewerage System(s)

- A. How many days in the last year was there a bypass or overflow of untreated wastewater due to heavy rain or snowmelt? _____ (Circle One)

0 = 0 points; 1 = 5 points; 2 = 10 points; 3 = 15 points; 4 = 20 points;
5 or more = 25 points

- B. How many days in the last year was there a bypass or overflow of untreated wastewater due to equipment failure? _____ (Circle One)

0 = 0 points; 1 = 5 points; 2 = 10 points; 3 = 15 points; 4 = 20 points;
5 or more = 25 points

- C. Specify whether the bypasses came from the city or village sewer system or from contract or tributary communities/sanitary districts, etc.

- D. Add together each point value circled in A and B and place in the blank below:

TOTAL POINT VALUE FOR PART 4 _____

Enter this value on the calculation page at the back of the CHAR, page 10.

Part 5: Sludge Storage

If your wastewater treatment plant does not landspread sludge, go on to Part 7.

How many months of sludge storage capacity does your wastewater/treatment facility have available, either on-site or off-site? (i.e., How many months can your facility operate without landspreading or disposing of sludge?)

_____ (Circle the appropriate point total.)

Greater than or equal to 4 months = 0 points
Less than 4 months, but greater than or equal to 3 months = 10 points
Less than 3 months, but greater than or equal to 2 months = 20 points
Less than 2 months, but greater than or equal to 1 month = 30 points
Less than one month = 50 points

TOTAL POINT VALUE FOR PART 5 _____

Enter this value on calculation page at the back of the CHAR, page 10.

Part 6: Sludge Disposal Sites

Does your facility have access to (and approval for) sufficient land disposal sites to provide proper land disposal for: (Circle the appropriate point total).

3 or more years = 0 points;
24-35 months = 10 points;
12 -23 months = 20 points;
6-12 months = 30 points;
less than 6 months = 50 points

TOTAL POINT VALUE FOR PART 6 _____

Enter this value on the calculation page at the back of the CHAR, page 10.

Facility Name: _____

Part 7: New Development

- A. Please provide the following information for all sewer extensions which were installed during the last calendar year.

Design Population: _____ Design Flow: _____ Design BOD₅: _____

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or BOD₅ loadings to the sewerage system were significantly increased (10-20%)? (Circle One)

No = 0 points; Yes = 10 points

- C. Are there any major new developments (industrial, commercial, or residential) anticipated in the next 2-3 years, such that either flow or BOD₅ loadings to the sewerage system could significantly increase (Circle One)

No = 0 points; Yes = 10 points

- D. Add together the point values circled in B and C and place the sum in the blank below.

TOTAL POINT VALUE FOR PART 7 _____

Enter this value on the calculation page at the back of the CMAR, page 10.

Part 8: Operator Certification and Education

- A. What was the name of the operator-in-charge on January 1, 1991? _____

- B. What is his/her certification number? _____

- C. What grade of operator-in-charge is required under Chapter NR 114, Wis. Adm. Code to operate the wastewater treatment plant?

Grade _____

- D. What was the grade of the operator-in-charge on January 1, 1991?

Grade _____

- E. Was the operator-in-charge on January 1, 1991 certified at a grade level required in order to operate this plant? (Circle One)

Yes = 0 points

No = 5 points

- F. How many hours of continuing education has the operator-in-charge completed over the last 2 (two) calendar years? (Circle One)

12 hours or more = 0 points

Less than 12 hours = 5 points

- G. Add together each point value you circled in E and F and place this sum in the blank below.

TOTAL POINT VALUE FOR PART 8 _____

Enter this value on calculation page at the back of the CMAR, page 10.

Facility Name: _____

Part 9: Financial Status

- A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses? If no, how are O&M costs being financed?

- B. Equipment Replacement Fund - GO TO PART C, if you did not receive a Wisconsin Fund or EPA Construction Grant for the sewer system and/or treatment plant.

A segregated equipment replacement fund is required if a Wisconsin Fund grant or a federal PL 92-500 grant was received for treatment facility construction. This section must be completed by all such grant recipients. Your response may be used to determine compliance with the replacement fund requirement.

Are the replacement funds in a segregated account? (Circle One) Yes No

Equipment replacement fund

Beginning Balance: Date _____ \$ _____
+ Addition: \$ _____
- Disbursements: \$ _____
Ending Balance: Date _____ \$ _____

- C. What financial resources do you have available to pay for your wastewater improvements/reconstruction/needs?

Part 10: Subjective Evaluation

- A. Describe briefly the physical and structural conditions of the wastewater treatment facility:

- B. Describe the condition of the sewer system: (clear water intrusion, lift stations)

Facility Name: _____

C. What sewerage system improvements does the community have under consideration for the next 10 years?

D. What was the theoretical design life of the plant and what do you believe is the remaining useful life of the wastewater treatment facilities?

E. What problems, if any, have been experienced over the last year that have threatened treatment or conveyance within the system?

F. Is your community presently involved in formal planning for treatment facility upgrading?

G. How many days in the last year were there basement backups at any point in the collection system for any reason, except clogging of the lateral connection? _____

H. Does your plant have a written plan for preventative maintenance on major equipment items? If yes, describe.

I. Does this preventative maintenance program depict frequency of intervals, types of lubrication and other preventative maintenance tasks necessary for each piece of equipment? (Circle One) Yes No

J. Are these preventative maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assessed properly? (Circle One) Yes No

Facility Name: _____

K. How many times has the operator-in-charge attended Department of Natural Resources exam sessions in the last two years? _____

L. What portion of the continuing education expenses of the operator-in-charge were paid for by the permittee? _____ By the operator? _____

M. Is there a written policy regarding continuing education and training for wastewater treatment plant employees? (Circle One)

Yes

No

Explain _____

N. Describe any major repairs or mechanical equipment replacement that you made in the last year and include the approximate cost for those repairs. Do not include major treatment plant construction or upgrading programs.

O. Any additional comments? (Attach additional sheets if necessary.)

Facility Name: _____

Point Calculation Page

1. Fill in the Values from parts 1 through 8 in the columns below. Add the numbers in the left column to determine the DMR point total that the wastewater system has generated for the previous calendar year.

<u>Actual Values</u>	<u>Maximum Possible</u>
Part 1 _____ points	80 points
Part 2 _____ points	100 points
Part 3 _____ points	40 points
Part 4 _____ points	50 points
Part 5 _____ points	50 points
Part 6 _____ points	50 points
Part 7 _____ points	20 points
Part 8 _____ points	10 points
TOTAL _____ points	400 points

2. Circle the facility type that best describes your plant's treatment and disposal of the wastewaters:

	<u>Multiplication Factor</u>
Mechanical plant with surface water discharge =	1.00
Aerated lagoon or stabilization pond or septic tank/sand filter with surface water discharge =	1.33
Mechanical plant using land disposal of liquid wastes =	1.14
Aerated lagoon or stabilization pond or septic tank/sand filter using land disposal of liquid wastes =	1.60

3. Multiply the total points from question #1 by the multiplication factor you circled in question #2. This is your compliance maintenance point total.

Total from #1 x Multiplication Factor = _____

Compliance Maintenance Point Total Ranges

0 - 70 pts. - Voluntary Range
71 - 120 pts. - Departmental Recommendation Range
121 - 400 pts. - Departmental Action Range

4. In questions #1, do any of the point values in the left column equal the maximum (right column) that could be generated for that particular question? (Circle One)

Yes **No**

5. If the answer to question 4 is yes, provide a written explanation for this situation in the space below.

COMPLIANCE MAINTENANCE RESOLUTION

RESOLVED that the (City), (Village) of _____
informs the Department of Natural Resources that the following actions were
taken by (governing body) _____.

1. Reviewed the Compliance Maintenance Annual Report which is attached to
this resolution.
2. Set forth the following actions necessary to maintain effluent
requirements contained in the WPDES Permit:
 - (a)
 - (b)
 - (c)
 - (d)

Passed by a (majority)(unanimous) vote of the _____
on (date).

Clerk

F3400.130

EXHIBIT 3

1989 COMPLIANCE MAINTENANCE ANNUAL REPORT SUMMARY

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PERMIT NUMBER	FACILITY NAME	DIR	AREA ENG	DESIGN FLOW	TOTAL POINTS	PART 1 POINTS	PART 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
60188	SCANDINAVIA SEWAGE TREATMENT PLANT	LM	MKC	0.0500	60	0	15	18	0	0	0	0	0	NO ACTION
36488	SCHOOL DISTRICT OF SUPERIOR-4 CORNERS	NW	CLO	0.0100	3	0	0	2	0	0	0	0	0	NO ACTION
24054	SEVASTOPOL SANITARY DIST NO 1	LM	GWK	0.0780	81	30	0	16	0	0	0	0	0	NO ACTION
60038	SEXTONVILLE SANITARY DISTRICT	SO	JGB	0.0500	22	0	0	14	0	0	0	0	0	P&S-EVALUATE FACILITY
21788	SEYMOUR WASTEWATER TREATMENT PLANT	LM	MKC	0.0780	18	5	0	14	0	0	0	0	0	NO ACTION
22608	SHARON VILLAGE OF	SE	BZB	0.2570	50	30	0	10	0	0	0	10	0	START SEWER REHAB FOR MI
28282	SHEBOYGAN CO COMP HEALTH CTR	SE	JAS	0.0873	88	0	30	38	0	20	0	0	0	NO ACTION
25411	SHEBOYGAN SEWAGE TREATMENT PLANT	SE	JAS	18.3800	58	0	0	14	5	30	0	10	0	NO ACTION
25453	SHELDON SEWAGE TREATMENT PLANT	NW	PE	0.0840	12	0	0	12	0	0	0	0	0	NO ACTION
20088	SHELL LAKE SEWAGE TREATMENT PLANT	NW	PJP	0.1850	18	0	0	12	0	0	0	0	0	NO ACTION
31127	SHERWOOD, VILLAGE OF	LM	JH1	0.0500	72	0	15	15	0	0	0	10	5	OPER CERT
28188	SHOCTON UTILITIES	LM	MKC	0.1500	63	0	25	18	0	0	20	0	0	NO ACTION
28321	SHULLSBURG, CITY OF	SO	JGB	0.2880	22	0	0	12	0	18	0	0	0	NO ACTION
81301.00	Silver Lake S.D. (Wastewa)	Im	Is	0.38	10	0	5	5	0	0	0	0	5	No Action
20481	SILVER LAKE WASTEWATER TREATMENT PLANT	SE	BZB	0.3830	40	0	0	40	0	0	0	0	0	NO ACTION
28924	SIREN, VILLAGE OF	NW	PJP	0.1880	42	0	40	2	0	0	0	0	0	ONR-BOARDERLINE SEW EXT ELIQ, IDENTIFY OPER CHA
22071	SISTER BAY WASTEWATER TREATMENT PLANT	LM	GWK	0.3000	162	35	55	24	0	5	0	0	0	CONST UNDERWAY
20280	SLINGER SEWAGE TREATMENT PLANT	SE	JAS	0.7800	88	0	0	18	0	10	20	20	0	NO ACTION
22241	SOLDIERS GROVE SEWAGE TREATMENT PLANT	WC	TPB	0.1140	75	0	35	40	0	0	0	0	0	REPLAC FUND
81115	SOLON SPRINGS, VILLAGE OF	NW	CLO	0.1180	34	0	0	11	0	0	0	10	0	P&S-LAGOONS, WET LANDS
30282	SOMERSET, VILLAGE OF	WC	PS	0.1500	81	25	0	18	0	60	0	0	0	NO ACTION
28818	SOUTH MILWAUKEE WASTEWATER TREATMENT PLA	SE	JFF	0.0000	30	0	0	10	0	10	10	0	0	NO ACTION
22282	SOUTH WAYNE WASTEWATER TREATMENT PLANT	SO	JGB	0.0530	65	15	0	40	0	10	0	0	0	NO ACTION
20737	SPARTA WASTEWATER TREATMENT PLANT	WC	TPB	1.5000	210	88	100	40	0	0	0	0	5	CONST START 8-80
21621	SPENCER SEWER UTILITY	NC	PH	0.2880	237	0	100	32	25	60	30	0	0	MI-SLUDGE SPREADING
21087	SPONOR SEWAGE TREATMENT PLANT	NW	PJP	0.0870	51	0	0	17	5	0	0	10	0	NO ACTION
60601	SPRING GREEN, SEWAGE DISPOSAL PLANT	SO	GWK	0.2800	28	0	0	18	0	10	0	0	0	NO ACTION
22373	SPRING VALLEY SEWAGE TREATMENT PLANT	WC	PS	0.1890	20	5	0	10	0	0	0	0	5	NO ACTION
30820	ST CLARA CONVENT	SO	JGB	0.1000	40	0	0	40	0	0	0	0	0	NO ACTION
28867	ST CLOUD UTILITY COMMISSION	SO	DJB	0.0440	81	0	35	26	0	0	0	0	0	CONST UNDERWAY
20788	ST CROIX FALLS BTP	NW	PJP	0.1800	20	0	0	10	0	0	0	10	0	NO ACTION
36880	ST CROIX MEADOWS MHPLANDFALL INC.	WC	PS	0.0188	80	15	30	5	0	0	0	0	0	NO ACTION
31188	ST JOSEPH SANITARY DISTRICT	WC	BE	0.0500	98	80	0	28	0	10	0	0	0	O&M -CALIBRATIONS
22185	ST NAZIANZ WATER & SEWER UTILITY	LM	JH1	0.1300	14	0	0	14	0	0	0	0	0	NO ACTION
21887	STANLEY SEWAGE TREATMENT PLANT	WC	BT	0.5874	68	45	0	6	0	0	0	0	0	NO ACTION
60884	STAR PRAIRIE VILLAGE OF	WC	PS	0.0581	43	15	0	12	0	0	0	0	0	NO ACTION
32831	STEPHENSVILLE SANITARY DISTRICT NO. 1	LM	JLS	0.0240	28	0	0	8	0	20	0	0	0	NO ACTION
60218	STETSONVILLE SEWAGE TREATMENT PLANT	NW	PE	0.0850	81	0	40	8	0	0	0	0	0	NO ACTION
29572	STEVENS POINT, CITY OF	NC	WA	4.1000	64	0	10	38	0	0	10	0	0	NO ACTION
38285	STITZER SANITARY DISTRICT	SO	JGB	0.0250	12	0	0	2	0	0	0	0	10	OPER CERT
30341	STOCK MFG CORP AND DINNER CLUB	LM	JH1		95	20	35	40	0	0	0	0	0	O&M
21380	STOCKBRIDGE SANITARY DISTRICT	LM	JH1	0.0500	45	0	0	40	0	0	0	0	5	NO ACTION
28304	STODDARD, VILLAGE OF	WC	TPB	0.1120	12	0	0	9	0	0	0	0	0	NO ACTION
60925	STONE LAKE SANITARY DISTRICT	NW	PE	0.0300	31	10	0	13	0	0	0	0	0	NO ACTION
20330	STOUGHTON SEWAGE DISPOSAL PLANT	SO	GWK	1.8500	88	15	0	24	0	30	0	0	0	NO ACTION
25588	STRATFORD VILLAGE OF	NC	PH	0.2000	47	0	45	2	0	0	0	0	0	O&M-SLUDGE
28981	STRUM (VILLAGE OF) SEWER UTILITY	WC	BE	0.1000	117	5	70	12		30	0	0	0	P&S-TO BE SUBMITTED

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22055	PRINCETON SEWAGE TREATMENT PLANT	BO	DJB	0.2770	64	30	0	11	0	0	0	0	0	NO ACTION
20834	PULASKI WASTEWATER TREATMENT PLANT	LM	GVK	0.4050	229	45	100	27	0	0	0	0	0	FACILITY PLAN
25194	PRAIRIE WATER AND WASTEWATER UTILITY	SE	BZS	30.0000	44	5	0	24	15	0	0	0	0	W
00790	RADISSON SEWAGE TREATMENT PLANT	NW	PE	0.0300	70	20	5	40	0	0	0	0	0	ER 3-31-90
00007	RAL-YIELD EQUITIES II	BO	GWO	0.0350	101	35	0	38	0	20	0	10	0	FP BEING PREPARED
31100	RANDOLPH, VILLAGE OF	BO	DJB	0.0100	14	0	0	14	0	0	0	0	0	NO ACTION
21415	RANDOM LAKE SEWAGE TREATMENT PLANT	BE	JAS	0.4450	70	15	0	20	0	20	0	10	0	NO ACTION
21081	READSTOWN SEWAGE TREATMENT PLANT	WC	TPS	0.0700	40	0	0	30	0	0	0	0	10	NO ACTION
20729	REDGRAVE SEWAGE TREATMENT PLANT	LM	JLS	0.1000	150	80	20	20	0	50	0	0	0	FP RECOMMENDED
20371	REEDSBURG SEWAGE TREATMENT PLANT	BO	JGS	1.4000	80	0	0	10	0	30	20	0	0	NO ACTION
21342	REEDSVILLE WASTEWATER TREATMENT FACILITY	LM	JH	0.1800	32	0	0	32	0	0	0	0	0	NO ACTION
20500	REESEVILLE, VILLAGE OF	BO	DJB	0.1000	132	0	55	5	0	0	0	0	0	NO ACTION
31600	REWEY, VILLAGE OF	BO	JGS	0.0250	12	0	0	12	0	0	0	0	0	NO ACTION
20044	RHINELANDER SEWAGE TREATMENT PLANT	NC	GWH	1.0000	84	0	0	24	0	30	0	0	0	NO ACTION
20017	RIS LAKE, VILLAGE OF	NW	PE	0.0000	28	0	0	18	0	0	0	0	10	NO ACTION
35581	RIS MOUNTAIN METROPOLITAN SEWERAGE DISTRICT	NC	PH	4.0400	88	0	60	0	0	0	0	10	0	NO ACTION
21005	RICE LAKE WASTEWATER TREATMENT PLANT	NW	PJP	2.0000	82	0	50	12	0	30	0	0	0	ONR -LOADINGS
20100	RICHLAND CENTER SEWAGE TREATMENT PLANT	BO	JGS	1.0000	155	40	20	30	5	30	10	0	0	NO ACTION
01000	RICHMOND T.H. #1	WC	PS	0.0075	141	50	0	18	0	0	0	0	10	FP-05-91
30004	RIDGE VIEW INN, INC.	WC	SE	0.2500	83	50	5	0	0	0	0	0	0	0-1M-OPERATIONAL ADJUSTMENT
21200	RIDGELAND SEWAGE TREATMENT PLANT	WC	ST	0.0320	114	65	0	11	0	0	0	0	10	P&S-FOR SAMPLER
51348	RIDGEWAY, VILLAGE OF	BO	JGS	0.0000	150	30	65	15	0	0	0	0	0	NO ACTION
30043	RIDGEWAY COUNTRY CLUB, INC.	LM	JLS	0.0000	40	0	0	40	0	0	0	0	0	NO ACTION
20117	RIO SEWAGE TREATMENT PLANT	BO	DJB	0.1150	35	15	0	11	0	0	0	0	0	NO ACTION
21032	RIPON WASTEWATER FACILITY	BO	DJB	2.0000	78	0	20	25	0	30	0	0	0	NO ACTION
20304	RIVER FALLS, CITY OF, MUNICIPAL UTILITY	WC	PS	1.0000	48	0	0	18	0	30	0	0	0	NO ACTION
00400	RIVEREDGE COUNTRY CLUB	NC	RFD	0.0075	57	0	5	45	0	0	0	0	10	POND MAINT. OPER. CERT.
20436	ROBERTS, VILLAGE OF	WC	PS	0.1350	10	0	0	10	0	0	0	0	0	NO ACTION
20041	ROCK SPRINGS SEWER AND WATER UTILITY	BO	JGS	0.0700	30	0	40	25	0	0	0	0	0	NO ACTION
20362	ROCKDALE, VILLAGE OF	BO	GWO	0.0250	34	0	0	34	0	0	0	0	0	P&S-5-1-90
22002	ROCKLAND SANITARY DISTRICT #1	LM	JH	0.0100	152	45	30	20	5	0	0	0	0	CONSTRUCT 1991
20007	ROCKLAND WATER AND SEWER UTILITIES	WC	SE	0.0400	78	40	0	38	0	0	0	0	0	NO ACTION
20420	ROSENDALE SEWAGE TREATMENT PLANT#	BO	DJB	0.2140	104	60	15	14	5	50	0	20	0	CONST TO BEGIN
00410	ROSHOLT SEWER COMMISSION	NC	WA	0.1000	105	0	40	30	0	0	0	0	0	PERMIT COMPLIANCE SCHEDULE
20070	ROXBURY SANITARY DISTRICT #1	BO	GWO	0.0200	133	55	0	25	0	0	0	0	0	ER 7-31-90
20031	ROYAL SCOTT SANITARY DISTRICT #1	LM	GVK	0.0020	102	75	55	32	0	0	0	0	0	FACILITY PLAN
20070	ROZELLVILLE SANITARY DISTRICT NO.1	NC	PH	0.0300	48	0	15	4	0	0	0	0	10	OPER CERT
21200	RUDOLPH SEWAGE TREATMENT PLANT	NC	RFD	0.1200	182	25	100	12	0	0	0	0	0	ONR-12-15-90
20310	RUSSELL T.H. SANITARY DISTRICT #1	NC	GWH	0.0300	55	0	20	21	0	0	0	0	0	NO ACTION
20355	SALEM UTILITY DISTRICT NO.1	BE	BZS	0.3000	133	0	0	55	38	0	0	10	0	F.P.
31400	SALEM UTILITY DISTRICT NO.2	BE	BZS	1.5700	18	0	0	18	0	0	0	0	0	NO ACTION
01010	SAND CREEK S.D.#1	WC	ST	0.0323	15	1	0	11	0	0	0	0	0	NO ACTION
01221	SANGER S. POWERS, CORRECTIONAL CENTER	LM	MKC	0.0000	51	25	0	7	0	0	0	0	0	NO ACTION
30020	SAUK CO. HEALTH CARE CENTER	BO	JGS	0.0420	43	0	25	0	0	0	0	0	0	NO ACTION
21665	SAUKVILLE SEWER UTILITY	BE	JAS	1.0000	111	60	0	15	5	30	0	0	0	NO ACTION
00334	SAUK-PRAIRIE SEWERAGE COMMISSION	BO	JGS	1.0000	82	20	0	5	0	0	0	0	0	NO ACTION
31704	SAXON SANITARY DISTRICT	NW	CLO	0.0140	31	7	0	11	0	0	0	0	0	REPLACEMENT FUND

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PERMIT NUMBER	FACILITY NAME	DIST	AREA ENG	DESIGN FLOW	TOTAL POINTS	PART 1 POINTS	PART 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
26843	WEBSTER VILLAGE OF, SEWER UTILITY	NW	PJP	0.0600	120	80	0	25	0	0	0	0	0	NO ACTION
26763	WEST BEND, CITY OF	SE	JAS	0.0000	18	0	0	18	0	0	0	0	0	NO ACTION
20368	WEST SALEM, VILLAGE OF	WC	BE	0.8200	107	15	80	22	0	10	0	0	0	NO ACTION
21792	WESTBY SEWAGE TREATMENT PLANT	WC	TPS	0.2296	86	80	0	14	0	10	0	0	0	ONR
26754	WESTERN RACINE CO SEW DIST	SE	BZB	0.9248	2	0	0	2	0	0	0	0	0	NO ACTION
22230	WESTFIELD DISPOSAL PLANT	SO	DJB	0.4500	57	5	15	12	0	20	0	0	0	NO ACTION
20923	WEYAUWEGA WASTEWATER TREATMENT PLANT	LM	MKC	0.6060	214	80	40	34	30	50	0	0	0	ER UNDER REVIEW
20701	WEYERHAEUSER SEWAGE TREATMENT PLANT	NW	PE	0.0500	72	20	15	18	0	0	0	0	0	NO ACTION
31011	WHEATLAND MOBILE HOME PARK	SE	BZB	0.0380	78	15	25	38	0	0	0	0	0	RECOMMEND ENGINEER STUDY
80652	WHEELER VILL OF	WC	BT	0.0250	155	85	15	12	0	5	0	0	0	ER 11-30-80
80686	WHITE LAKE, VILL OF	NC	PH	0.0500	22	0	0	14	0	0	0	0	0	NO ACTION
20670	WHITEHALL, CITY OF	WC	BE	1.2000	33	0	5	28	0	0	0	0	0	NO ACTION
22047	WHITELAW WASTEWATER TREATMENT PLANT	LM	JUN	0.1000	80	0	40	40	0	0	0	0	0	NO ACTION
20001	WHITEWATER WASTEWATER TREATMENT PLANT	SE	BZB	3.6500	34	0	0	14	0	20	0	0	0	TOO MANY BASEMENT BACKUPS
21636	WHITING SEWAGE TREATMENT PLANT	NC	WA	0.0000	19	0	0	19	0	0	0	0	0	NO ACTION
80071	WILD ROSE, VILLAGE OF	LM	JLS	0.0900	88	10	40	0	0	0	0	0	0	CONST FINISHED
32140	WILSON SEWER UTILITY	WC	PS	0.0240	19	0	0	14	0	5	0	0	0	NO ACTION
22482	WILTON WASTEWATER TREATMENT PLANT	WC	TPS	0.0900	100	80	0	11	0	0	0	0	0	ONR 12-3-80
21936	WINNECONNE SEWAGE TREATMENT PLANT	LM	JLS	0.4950	23	5	0	18	0	0	0	0	0	NO ACTION
80089	WINTER VILLAGE OF	NW	PE	0.0500	66	0	0	26	0	0	0	0	0	NO ACTION
29611	WIS ACADEMY	SO	DJB	0.0340	65	0	45	40	0	0	0	0	0	NO ACTION
23078	WIS AIR NATIONAL GUARD	NC	WA	0.1275	23	0	0	17	0	0	0	0	0	CONST TO START
32018	WIS CORP OF SEVENTH DAY ADVENT-GO BECK	SO	DJB	0.1000	29	0	0	8	0	0	0	0	0	OPER CERT
31402	WIS DELLS LAKE DELTON SEW COMM	SO	DJB	2.8300	82	0	0	12	10	50	10	0	0	ONR-SLUDGE
25844	WIS RAPIDS SEWAGE TREATMENT PLANT	NC	RRO	4.0000	179	65	0	40	5	50	0	10	0	P&S UNDER REVIEW
30086	WIS STATE DHSS FLAMBEAU STATE CAMP	NW	PE	0.0190	45	0	5	17	0	0	0	0	0	DMR REPORTS
80470	WIS STATE DHSS FOX LAKE CORR INST	SO	DJB	0.0900	171	90	0	27	0	0	0	0	0	NO ACTION
80267	WIS STATE DHSS-ETHAN ALLEN SCHOOL	SE	BZB	0.0500	63	25	10	38	0	0	0	0	0	FP BEING PREPARED
80721	WIS STATE DHSS-KETTLE MORRAINE COR INST	SE	JAS	0.0600	171	90	0	40	0	20	0	10	0	FACILITY PLANNING SINCE '78
28791	WIS STATE DHSS-LINCOLN HILLS SCHOOL	NC	QWH	0.0750	61	35	5	6	0	0	0	0	0	LAGOON LEAK STUDY
80305	WIS STATE DHSS-MCNAUGHTON CAMP	NC	JTN	0.0120	192	65	50	0	0	0	0	0	0	CONSTR REPAIRS
29416	WIS STATE DHSS-SO WIS COLONY-TR SCHOOL	SE	BZB	0.4450	45	0	0	40	0	0	0	0	0	NO ACTION
30449	WIS STATE DNR COPPER FALLS ST PARK	NW	CLO	0.0189	67	0	0	40	0	0	0	0	0	OPERT CERT
34685	WIS STATE DNR PATTISON ST PARK	NW	CLO	0.0250	33	0	0	28	0	0	0	0	0	ER RECOMMENDED-DECHLOR
38163	WIS STATE DNR PIKE LAKE ST PARK	SE	JAS	0.0620	110	0	40	18	0	0	0	0	0	CONNECT TO HARTFORD
81055	WIS STATE DNR-BLUE MOUNDS ST PARK	SO	JOS	0.0050	45	5	0	17	0	0	0	0	0	NO ACTION
31887	WIS STATE DNR-BONG RECREATION AREA	SE	BZB	0.0102	38	0	0	8	0	0	0	10	10	NO ACTION
80358	WIS STATE DNR-LONG LAKE REC AREA	SE	JAS	0.0100	32	5	5	5	0	0	0	0	0	FACILITY PLAN
29343	WIS STATE DNR-PENINSULA ST PARK	LM	QWK	0.0400	89	0	60	2	0	0	0	0	0	ER- 04-30-80
31879	WIS STATE DNR-YELLOWSTONE LAKE ST PARK	SO	JOS	0.0014	40	0	0	20	0	0	0	0	0	NO ACTION
30868	WIS STATE DOT-EAST TROY REST AREA 58	SE	BZB	0.0180	34	0	0	34	0	0	0	0	0	NO ACTION
80411	WIS STATE DVA-VETERANS HOME	LM	MKC	0.2900	137	75	5	40	0	0	0	0	0	ONR-05-30-80
80481	WIS STATE UNIVERSITY-PIGEON LAKE STATION	NW	CLO	0.0112	89	35	0	22	0	0	0	0	0	O&M SAMPLING
28444	WITTENBERG SEWER DEPARTMENT	LM	BBO	0.2800	94	25	0	11	0	0	0	0	0	
28482	WOLF TREATMENT PLANT	LM	BBO	3.0000	85	0	0	30	5	50	0	0	0	
29888	WONIEWOC, VILLAGE	NC	WA	0.1400	31	5	0	16	0	10	0	0	0	W-CONTROL CLEARWATER, MISC ACTION
81093	WOODLAKE TRAILS DEVELOPMENT CO. LTD	SO	DJB	0.0100	75	30	0	12	0	0	0	0	0	NO ACTION

1989 COMPLIANCE MAINTENANCE ANNUAL REPORT SUMMARY

30-Aug-90

PERMIT NUMBER	FACILITY NAME	DIG	AREA ENR	DESIGN PLDWN	TOTAL POINTS	PART 1 POINTS	PART 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
21113	STURGEON BAY UTILITIES	LM	GVK	2.9200	18	0	0	18	0	0	0	0	0	NO ACTION
60887	ST. BEDE PRIORY/CTR	WC	ST	0.0008	42	0	15	11	0	0	0	0	0	NO ACTION
31876	SUANICO SAN. DIST #1	LM	GVK	0.2900	68	0	0	18	0	0	0	0	0	ONR-SLUDGE
31844	SULLIVAN SANITARY DISTRICT #1	SO	GWO	0.1000	18	0	0	18	0	0	0	0	0	NO ACTION
25685	SULLIVAN SEWAGE TREATMENT PLANT	SO	GWO	0.0800	10	0	0	10	0	0	0	0	0	NO ACTION
20478	SUN PRAIRIE SEWAGE TREATMENT PLANT	SO	GWO	3.1000	29	6	0	14	0	0	0	10	0	NO ACTION
25583	SUPERIOR SEWAGE DISPOSAL SYSTEM	NW	CLO	5.0000	67	15	0	22	0	20	0	0	0	O&M-SAMPLING
30431	SUPERIOR VILLAGE OF	NW	CLO	0.0540	110	75	0	8	0	0	0	0	0	NO ACTION
20677	SURING SEWAGE TREATMENT PLANT	LM	BBO	0.1000	80	0	0	40	0	50	0	0	0	P&S-DISINFECT
20550	SUSSEX WASTEWATER TREATMENT FACILITY	SE	JAS	1.0000	67	5	0	22	0	50	0	10	0	FP DATE?
31881	TAYLOR SEWAGE TREATMENT PLANT	WC	MB	0.0810	121	40	45	5	0	0	0	0	0	
22322	THERESA SEWER & WATER UTILITY	SO	DJB	0.3800	128	60	5	5	5	30	0	0	0	NO ACTION
25015	THORP WASTEWATER TREATMENT PLANT	WC	MB	0.3480	8	0	5	2	0	0	0	0	0	NO ACTION
61263	THOUSAND TRAILS, INC	NC	WA	0.0475	48	0	40	8	0	0	0	0	0	NO ACTION
22553	THREE LAKES SANITARY DISTRICT #1	NC	GWH	0.1310	32	0	0	22	0	0	0	0	10	NO ACTION
22349	TIGERTON VILLAGE	LM	BBO	0.1000	0	0	0	0	0	0	0	0	0	NO ACTION
21318	TOMAH SEWAGE TREATMENT PLANT	WC	TPS	1.0300	77	10	25	22	0	10	0	10	0	NO ACTION
21848	TOMAHAWK CITY OF	NC	GWH	0.4200	84	0	0	34	0	50	0	0	0	O&M PLAN REPLAC FUND
28000	TONY SEWAGE TREATMENT PLANT	NW	PE	0.0228	68	45	5	15	0	0	0	0	0	O&M
20888	TREMPELEAU SEWAGE TREATMENT PLANT	WC	BE	0.1350	84	50	0	34	0	0	0	0	0	ONR BOD LOADINGS
25631	TURTLE LAKE, VILLAGE OF	NW	FJP	0.7230	31	0	15	8	0	0	0	0	0	NO ACTION
60585	TWIN CITY EAST / LA BON	WC	PS	0.0150	91	10	0	45	0	30	0	0	0	
21696	TWIN LAKES SEWAGE TREATMENT PLANT	SE	BZS	0.7100	72	0	0	34	0	20	0	0	0	NO ACTION
26880	TWO RIVERS WASTEWATER TREATMENT PLANT	LM	JH	4.4000	38	0	0	28	0	10	0	0	0	NO ACTION
25640	UNION CENTER, VILLAGE OF	NC	WA	0.0400	105	0	45	40	0	20	0	0	0	ONR-10-31-80
26291	UNION GROVE SEWAGE TREATMENT PLANT	SE	BZS	1.0000	27	0	0	22	5	0	0	0	0	NO ACTION
60520	UNITY TOWN OF	NC	PH	0.0781	188	40	65	25	0	0	0	0	0	ONR 12-31-80
21831	VALDESBURG VILLAGE OF	LM	JH	0.1800	81	15	0	38	0	0	0	0	0	FP 12-31-81/11 6-30-81
22454	VERONA CITY OF	SO	GWO	0.6250	102	30	50	22	0	0	0	0	0	ONR-PROGRESS REPORT-07-31-80
30306	VESTER, VILLAGE OF	NC	RRD	0.0790	63	10	10	27	0	0	0	0	0	FP RECOMMENDED
28028	VILLAGE OF POTTER	LM	JH	0.0400	40	0	0	40	0	0	0	0	0	NO ACTION
21148	VIOLA SEWAGE TREATMENT PLANT	WC	TPS	0.1000	34	0	15	11	0	0	0	0	0	NO ACTION
21920	VIROQUA SEWAGE TREATMENT PLANT	WC	TPS	0.8000	40	10	0	25	0	10	0	0	0	NO ACTION
22012	WABENO SANITARY DISTRICT #1	NC	GWH	0.1000	38	0	0	27	0	0	0	0	0	NO ACTION
22471	WALDO WASTEWATER UTILITY	SE	JAS	0.1000	55	0	5	40	0	10	0	0	0	NO ACTION
31481	WALWORTH COUNTY METRO	SE	BZS	3.6000	44	0	0	14	20	0	0	10	0	NO ACTION
60258	WARRENS, VILL OF	WC	TPS	0.0450	30	0	0	14	0	0	0	0	0	OPERATOR CERTIFICATION, EST. REPAIR/REPLACEMENT
22678	WASHBURN WASTEWATER TREATMENT PLANT	NW	CLO	0.2500	238	45	75	24	0	0	0	0	0	FP 6-30-80
30881	WATERLOO SEWAGE DISPOSAL PLANT	SO	GWO	0.6390	61	55	0	6	0	0	0	0	0	NO ACTION
28541	WATERTOWN, CITY OF	SO	GWO	5.2000	83	0	15	18	0	30	0	0	0	NO ACTION
29071	WALKESHA, CITY OF	SE	BZS	18.0000	150	60	40	20	30	0	0	0	0	NO ACTION
30480	WALUPACA, CITY OF	LM	MKC	1.2500	68	0	10	38	0	20	0	0	0	NO ACTION
22772	WAUPUN SEWAGE TREATMENT PLANT	SO	DJB	1.8000	60	50	0	10	0	0	0	0	0	NO ACTION
25738	WAUSAU SEWERAGE UTILITY	NC	PH	0.2000	95	0	0	40	5	50	0	0	0	CONST UNDERWAY
60011	WAUSAUKEE WATER & SEWER UTILITY	LM	GS	0.0800	184	80	30	25	0	0	0	0	0	ONR-05-30-80
60178	WAUTOMA, CITY OF	LM	JLS	0.4800	168	70	0	34	15	20	0	0	0	P&S (6-20-80) SLUDGE
22278	WAUZeka SEWAGE TREATMENT PLANT	WC	TPS	0.0800	88	15	20	38	0	0	0	10	5	NO ACTION

1989 COMPLIANCE MAINTENANCE ANNUAL REPORT SUMMARY

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PERMIT NUMBER	FACILITY NAME	DIST	ENR	DESIGN FLOW	TOTAL PORTS	PORT 1	PORT 2	PORT 3	PORT 4	PORT 5	PORT 6	PORT 7	PORT 8	PORT 9	PORT 10	PORT 11	PORT 12	PORT 13	PORT 14	PORT 15	PORT 16	PORT 17	PORT 18	PORT 19	PORT 20	PORT 21	PORT 22	PORT 23	PORT 24	PORT 25	PORT 26	PORT 27	PORT 28	PORT 29	PORT 30	PORT 31	PORT 32	PORT 33	PORT 34	PORT 35	PORT 36	PORT 37	PORT 38	PORT 39	PORT 40	PORT 41	PORT 42	PORT 43	PORT 44	PORT 45	PORT 46	PORT 47	PORT 48	PORT 49	PORT 50	PORT 51	PORT 52	PORT 53	PORT 54	PORT 55	PORT 56	PORT 57	PORT 58	PORT 59	PORT 60	PORT 61	PORT 62	PORT 63	PORT 64	PORT 65	PORT 66	PORT 67	PORT 68	PORT 69	PORT 70	PORT 71	PORT 72	PORT 73	PORT 74	PORT 75	PORT 76	PORT 77	PORT 78	PORT 79	PORT 80	PORT 81	PORT 82	PORT 83	PORT 84	PORT 85	PORT 86	PORT 87	PORT 88	PORT 89	PORT 90	PORT 91	PORT 92	PORT 93	PORT 94	PORT 95	PORT 96	PORT 97	PORT 98	PORT 99	PORT 100	PORT 101	PORT 102	PORT 103	PORT 104	PORT 105	PORT 106	PORT 107	PORT 108	PORT 109	PORT 110	PORT 111	PORT 112	PORT 113	PORT 114	PORT 115	PORT 116	PORT 117	PORT 118	PORT 119	PORT 120	PORT 121	PORT 122	PORT 123	PORT 124	PORT 125	PORT 126	PORT 127	PORT 128	PORT 129	PORT 130	PORT 131	PORT 132	PORT 133	PORT 134	PORT 135	PORT 136	PORT 137	PORT 138	PORT 139	PORT 140	PORT 141	PORT 142	PORT 143	PORT 144	PORT 145	PORT 146	PORT 147	PORT 148	PORT 149	PORT 150	PORT 151	PORT 152	PORT 153	PORT 154	PORT 155	PORT 156	PORT 157	PORT 158	PORT 159	PORT 160	PORT 161	PORT 162	PORT 163	PORT 164	PORT 165	PORT 166	PORT 167	PORT 168	PORT 169	PORT 170	PORT 171	PORT 172	PORT 173	PORT 174	PORT 175	PORT 176	PORT 177	PORT 178	PORT 179	PORT 180	PORT 181	PORT 182	PORT 183	PORT 184	PORT 185	PORT 186	PORT 187	PORT 188	PORT 189	PORT 190	PORT 191	PORT 192	PORT 193	PORT 194	PORT 195	PORT 196	PORT 197	PORT 198	PORT 199	PORT 200	PORT 201	PORT 202	PORT 203	PORT 204	PORT 205	PORT 206	PORT 207	PORT 208	PORT 209	PORT 210	PORT 211	PORT 212	PORT 213	PORT 214	PORT 215	PORT 216	PORT 217	PORT 218	PORT 219	PORT 220	PORT 221	PORT 222	PORT 223	PORT 224	PORT 225	PORT 226	PORT 227	PORT 228	PORT 229	PORT 230	PORT 231	PORT 232	PORT 233	PORT 234	PORT 235	PORT 236	PORT 237	PORT 238	PORT 239	PORT 240	PORT 241	PORT 242	PORT 243	PORT 244	PORT 245	PORT 246	PORT 247	PORT 248	PORT 249	PORT 250	PORT 251	PORT 252	PORT 253	PORT 254	PORT 255	PORT 256	PORT 257	PORT 258	PORT 259	PORT 260	PORT 261	PORT 262	PORT 263	PORT 264	PORT 265	PORT 266	PORT 267	PORT 268	PORT 269	PORT 270	PORT 271	PORT 272	PORT 273	PORT 274	PORT 275	PORT 276	PORT 277	PORT 278	PORT 279	PORT 280	PORT 281	PORT 282	PORT 283	PORT 284	PORT 285	PORT 286	PORT 287	PORT 288	PORT 289	PORT 290	PORT 291	PORT 292	PORT 293	PORT 294	PORT 295	PORT 296	PORT 297	PORT 298	PORT 299	PORT 300	PORT 301	PORT 302	PORT 303	PORT 304	PORT 305	PORT 306	PORT 307	PORT 308	PORT 309	PORT 310	PORT 311	PORT 312	PORT 313	PORT 314	PORT 315	PORT 316	PORT 317	PORT 318	PORT 319	PORT 320	PORT 321	PORT 322	PORT 323	PORT 324	PORT 325	PORT 326	PORT 327	PORT 328	PORT 329	PORT 330	PORT 331	PORT 332	PORT 333	PORT 334	PORT 335	PORT 336	PORT 337	PORT 338	PORT 339	PORT 340	PORT 341	PORT 342	PORT 343	PORT 344	PORT 345	PORT 346	PORT 347	PORT 348	PORT 349	PORT 350	PORT 351	PORT 352	PORT 353	PORT 354	PORT 355	PORT 356	PORT 357	PORT 358	PORT 359	PORT 360	PORT 361	PORT 362	PORT 363	PORT 364	PORT 365	PORT 366	PORT 367	PORT 368	PORT 369	PORT 370	PORT 371	PORT 372	PORT 373	PORT 374	PORT 375	PORT 376	PORT 377	PORT 378	PORT 379	PORT 380	PORT 381	PORT 382	PORT 383	PORT 384	PORT 385	PORT 386	PORT 387	PORT 388	PORT 389	PORT 390	PORT 391	PORT 392	PORT 393	PORT 394	PORT 395	PORT 396	PORT 397	PORT 398	PORT 399	PORT 400	PORT 401	PORT 402	PORT 403	PORT 404	PORT 405	PORT 406	PORT 407	PORT 408	PORT 409	PORT 410	PORT 411	PORT 412	PORT 413	PORT 414	PORT 415	PORT 416	PORT 417	PORT 418	PORT 419	PORT 420	PORT 421	PORT 422	PORT 423	PORT 424	PORT 425	PORT 426	PORT 427	PORT 428	PORT 429	PORT 430	PORT 431	PORT 432	PORT 433	PORT 434	PORT 435	PORT 436	PORT 437	PORT 438	PORT 439	PORT 440	PORT 441	PORT 442	PORT 443	PORT 444	PORT 445	PORT 446	PORT 447	PORT 448	PORT 449	PORT 450	PORT 451	PORT 452	PORT 453	PORT 454	PORT 455	PORT 456	PORT 457	PORT 458	PORT 459	PORT 460	PORT 461	PORT 462	PORT 463	PORT 464	PORT 465	PORT 466	PORT 467	PORT 468	PORT 469	PORT 470	PORT 471	PORT 472	PORT 473	PORT 474	PORT 475	PORT 476	PORT 477	PORT 478	PORT 479	PORT 480	PORT 481	PORT 482	PORT 483	PORT 484	PORT 485	PORT 486	PORT 487	PORT 488	PORT 489	PORT 490	PORT 491	PORT 492	PORT 493	PORT 494	PORT 495	PORT 496	PORT 497	PORT 498	PORT 499	PORT 500	PORT 501	PORT 502	PORT 503	PORT 504	PORT 505	PORT 506	PORT 507	PORT 508	PORT 509	PORT 510	PORT 511	PORT 512	PORT 513	PORT 514	PORT 515	PORT 516	PORT 517	PORT 518	PORT 519	PORT 520	PORT 521	PORT 522	PORT 523	PORT 524	PORT 525	PORT 526	PORT 527	PORT 528	PORT 529	PORT 530	PORT 531	PORT 532	PORT 533	PORT 534	PORT 535	PORT 536	PORT 537	PORT 538	PORT 539	PORT 540	PORT 541	PORT 542	PORT 543	PORT 544	PORT 545	PORT 546	PORT 547	PORT 548	PORT 549	PORT 550	PORT 551	PORT 552	PORT 553	PORT 554	PORT 555	PORT 556	PORT 557	PORT 558	PORT 559	PORT 560	PORT 561	PORT 562	PORT 563	PORT 564	PORT 565	PORT 566	PORT 567	PORT 568	PORT 569	PORT 570	PORT 571	PORT 572	PORT 573	PORT 574	PORT 575	PORT 576	PORT 577	PORT 578	PORT 579	PORT 580	PORT 581	PORT 582	PORT 583	PORT 584	PORT 585	PORT 586	PORT 587	PORT 588	PORT 589	PORT 590	PORT 591	PORT 592	PORT 593	PORT 594	PORT 595	PORT 596	PORT 597	PORT 598	PORT 599	PORT 600	PORT 601	PORT 602	PORT 603	PORT 604	PORT 605	PORT 606	PORT 607	PORT 608	PORT 609	PORT 610	PORT 611	PORT 612	PORT 613	PORT 614	PORT 615	PORT 616	PORT 617	PORT 618	PORT 619	PORT 620	PORT 621	PORT 622	PORT 623	PORT 624	PORT 625	PORT 626	PORT 627	PORT 628	PORT 629	PORT 630	PORT 631	PORT 632	PORT 633	PORT 634	PORT 635	PORT 636	PORT 637	PORT 638	PORT 639	PORT 640	PORT 641	PORT 642	PORT 643	PORT 644	PORT 645	PORT 646	PORT 647	PORT 648	PORT 649	PORT 650	PORT 651	PORT 652	PORT 653	PORT 654	PORT 655	PORT 656	PORT 657	PORT 658	PORT 659	PORT 660	PORT 661	PORT 662	PORT 663	PORT 664	PORT 665	PORT 666	PORT 667	PORT 668	PORT 669	PORT 670	PORT 671	PORT 672	PORT 673	PORT 674	PORT 675	PORT 676	PORT 677	PORT 678	PORT 679	PORT 680	PORT 681	PORT 682	PORT 683	PORT 684	PORT 685	PORT 686	PORT 687	PORT 688	PORT 689	PORT 690	PORT 691	PORT 692	PORT 693	PORT 694	PORT 695	PORT 696	PORT 697	PORT 698	PORT 699	PORT 700	PORT 701	PORT 702	PORT 703	PORT 704	PORT 705	PORT 706	PORT 707	PORT 708	PORT 709	PORT 710	PORT 711	PORT 712	PORT 713	PORT 714	PORT 715	PORT 716	PORT 717	PORT 718	PORT 719	PORT 720	PORT 721	PORT 722	PORT 723	PORT 724	PORT 725	PORT 726	PORT 727	PORT 728	PORT 729	PORT 730	PORT 731	PORT 732	PORT 733	PORT 734	PORT 735	PORT 736	PORT 737	PORT 738	PORT 739	PORT 740	PORT 741	PORT 742	PORT 743	PORT 744	PORT 745	PORT 746	PORT 747	PORT 748	PORT 749	PORT 750	PORT 751	PORT 752	PORT 753	PORT 754	PORT 755	PORT 756	PORT 757	PORT 758	PORT 759	PORT 760	PORT 761	PORT 762	PORT 763	PORT 764	PORT 765	PORT 766	PORT 767	PORT 768	PORT 769	PORT 770	PORT 771	PORT 772	PORT 773	PORT 774	PORT 775	PORT 776	PORT 777	PORT 778	PORT 779	PORT 780	PORT 781	PORT 782	PORT 783	PORT 784	PORT 785	PORT 786	PORT 787	PORT 788	PORT 789	PORT 790	PORT 791	PORT 792	PORT 793	PORT 794	PORT 795	PORT 796	PORT 797	PORT 798	PORT 799	PORT 800	PORT 801	PORT 802	PORT 803	PORT 804	PORT 805	PORT 806	PORT 807	PORT 808	PORT 809	PORT 810	PORT 811	PORT 812	PORT 813	PORT 814	PORT 815	PORT 816	PORT 817	PORT 818	PORT 819	PORT 820	PORT 821	PORT 822	PORT 823	PORT 824	PORT 825	PORT 826	PORT 827	PORT 828	PORT 829	PORT 830	PORT 831	PORT 832	PORT 833	PORT 834	PORT 835	PORT 836	PORT 837	PORT 838	PORT 839	PORT 840	PORT 841	PORT 842	PORT 843	PORT 844	PORT 845	PORT 846	PORT 847	PORT 848	PORT 849	PORT 850	PORT 851	PORT 852	PORT 853	PORT 854	PORT 855	PORT 856	PORT 857	PORT 858	PORT 859	PORT 860	PORT 861	PORT 862	PORT 863	PORT 864	PORT 865	PORT 866	PORT 867	PORT 868	PORT 869	PORT 870	PORT 871	PORT 872	PORT 873	PORT 874	PORT 875	PORT 876	PORT 877	PORT 878	PORT 879	PORT 880	PORT 881	PORT 882	PORT 883	PORT 884	PORT 885	PORT 886	PORT 887	PORT 888	PORT 889	PORT 890	PORT 891	PORT 892	PORT 893	PORT 894	PORT 895	PORT 896	PORT 897	PORT 898	PORT 899	PORT 900	PORT 901	PORT 902	PORT 903	PORT 904	PORT 905	PORT 906	PORT 907	PORT 908	PORT 909	PORT 910	PORT 911	PORT 912	PORT 913	PORT 914	PORT 915	PORT 916	PORT 917	PORT 918	PORT 919	PORT 920	PORT 921	PORT 922	PORT 923	PORT 924	PORT 925	PORT 926	PORT 927	PORT 928	PORT 929	PORT 930	PORT 931	PORT 932	PORT 933	PORT 934	PORT 935	PORT 936	PORT 937	PORT 938	PORT 939	PORT 940	PORT 941	PORT 942	PORT 943	PORT 944	PORT 945	PORT 946	PORT 947	PORT 948	PORT 949	PORT 950	PORT 951	PORT 952	PORT 953	PORT 954	PORT 955	PORT 956	PORT 957	PORT 958	PORT 959	PORT 960	PORT 961	PORT 962	PORT 963	PORT 964	PORT 965	PORT 966	PORT 967	PORT 968	PORT 969	PORT 970	PORT 971	PORT 972	PORT 973	PORT 974	PORT 975	PORT 976	PORT 977	PORT 978	PORT 979	PORT 980	PORT 981	PORT 982	PORT 983	PORT 984	PORT 985	PORT 986	PORT 987	PORT 988	PORT 989	PORT 990	PORT 991	PORT 992	PORT 993	PORT 994	PORT 995	PORT 996	PORT 997	PORT 998	PORT 999	PORT 1000	PORT 1001	PORT 1002	PORT 1003	PORT 1004	PORT 1005	PORT 1006	PORT 1007	PORT 1008	PORT 1009	PORT 1010	PORT 1011	PORT 1012	PORT 1013	PORT 1014	PORT 1015	PORT 1016	PORT 1017	PORT 1018	PORT 1019	PORT 1020	PORT 1021	PORT 1022	PORT 1023	PORT 1024	PORT 1025	PORT 1026	PORT 1027	PORT 1028	PORT 1029	PORT 1030	PORT 1031	PORT 1032	PORT 1033	PORT 1034	PORT 1035	PORT 1036	PORT 1037	PORT 1038	PORT 1039	PORT 1040	PORT 1041	PORT 1042	PORT 1043	PORT 1044	PORT 1045	PORT 1046	PORT 1047	PORT 1048	PORT 1049	PORT 1050	PORT 1051	PORT 1052	PORT 1053	PORT 1054	PORT 1055	PORT 1056	PORT 1057	PORT 1058	PORT 1059	PORT 1060	PORT 1061	PORT 1062	PORT 1063	PORT 1064	PORT 1065	PORT 1066	PORT 1067	PORT 1068	PORT 1069	PORT 1070	PORT 1071	PORT 1072	PORT 1073	PORT 1074	PORT 1075	PORT 1076	PORT 1077	PORT 1078	PORT 1079	PORT 1080	PORT 1081	PORT 1082	PORT 1083	PORT 1084	PORT 1085	PORT 1086	PORT 1087	PORT 1088	PORT 1089	PORT 1090	PORT 1091	PORT 1092	PORT 1093	PORT 1094	PORT 1095	PORT 1096	PORT 1097	PORT 1098	PORT 1099	PORT 1100	PORT 1101	PORT 1102	PORT 1103	PORT 1104	PORT 1105	PORT 1106	PORT 1107	PORT 1108	PORT 1109	PORT 1110	PORT 1111	PORT 1112	PORT 1113	PORT 1114	PORT 1115	PORT 1116	PORT 1117	PORT 1118	PORT 1119	PORT 1120	PORT 1121	PORT 1122	PORT 1123	PORT 1124	PORT 1125	PORT 1126	PORT 1127	PORT 1128	PORT 1129	PORT 1130	PORT 1131	PORT 1132	PORT 1133	PORT 1134	PORT 1135	PORT 1136	PORT 1137	PORT 1138	PORT 1139	PORT 1140	PORT 1141	PORT 1142	PORT 1143	PORT 1144	PORT 1145	PORT 1146	PORT 1147	PORT 1148	PORT 1149	PORT 1150	PORT 1151	PORT 1152	PORT 1153	PORT 1154	PORT 1155	PORT 1156	PORT 1157	PORT 1158	PORT 1159	PORT 1160	PORT 1161	PORT 1162	PORT 1163	PORT 1164	PORT 1165	PORT 1166	PORT 1167	PORT 1168	PORT 1169	PORT 1170	PORT 1171	PORT 1172	PORT 1173	PORT 1174	PORT 1175	PORT 1176	PORT 1177	PORT 1178	PORT 1179	PORT 1180	PORT 1181	PORT 1182	PORT 1183	PORT 1184	PORT 1185	PORT 1186	PORT 1187	PORT 1188	PORT 1189	PORT 1190	PORT 1191	PORT 1192	PORT 1193	PORT 1194	PORT 1195	PORT 1196	PORT 1197	PORT 1198	PORT 1199	PORT 1200	PORT 1201	PORT 1202	PORT 1203	PORT 1204	PORT 1205	PORT 1206	PORT 1207	PORT 1208	PORT 1209	PORT 1210	PORT 1211	PORT 1212	PORT 1213	PORT 1214	PORT 1215	PORT 1216	PORT 1217	PORT 1218	PORT 1219	PORT 1220	PORT 1221	PORT 1
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REPORT NUMBER	FACILITY NAME	DR	ENG	FLOW	TOTAL POINTS	INF 1 POINTS	INF 2 POINTS	INF 3 POINTS	INF 4 POINTS	INF 5 POINTS	INF 6 POINTS	INF 7 POINTS	INF 8 POINTS	RECOMMENDATION BY AREA ENGINEER
20581	MONDOM WASTEWATER TREATMENT PLANT	WC	JS	0.2870	48	0	45	4	0	0	0	0	0	NO ACTION
20382	MONROE, CITY OF	BO	GWO	3.6700	11	0	5	6	0	0	0	0	0	IN-CONTROL CLEAR WATER
24813	MONTELLO WASTEWATER TREATMENT PLANT	BO	DJB	0.3000	31	5	0	18	0	0	0	0	10	NO ACTION
24821	MONTFORT SEWER DEPT	BO	JGS	0.0600	55	15	15	6	0	0	0	0	0	NO ACTION
24830	MONTICELLO, VILLAGE OF	BO	GWO	0.1840	145	55	20	20	0	50	0	0	0	P&S-(6-1-89)-DISINFEC SAMPLING
22308	MONTREAL WASTEWATER TREATMENT PLANT	NW	CLO	0.0500	35	0	0	18	0	0	0	0	10	P&S-(4-30-82)-DECHLOR
00712	MORRISONVILLE SANITARY DISTRICT	BO	GWO	0.2010	31	15	0	6	0	0	0	0	0	NO ACTION
22380	MOSNEE WATER AND SEWER UTILITY	NC	PH	0.5500	60	0	0	30	0	10	10	10	10	FP RECOMMENDED
35883	MOUNT CALVARY	BO	DJB	0.1700	163	0	80	25	0	0	0	0	0	NO ACTION
20807	MOUNT HOPE SEWAGE TREATMENT PLANT	BO	JGS	0.0200	18	0	0	4	5	0	0	0	0	NO ACTION
20281	MOUNT MOREB	BO	GWO	0.0000	147	0	50	22	10	50	0	10	5	CONST UNDERWAY
00840	MOUNT TELEMAR LODGE	NW	CLO	0.1000	58	0	0	32	0	10	0	10	0	ONR RECOMMENDED
20285	MUKWONAGO SEWAGE TREATMENT PLANT	SE	BZB	1.6000	28	0	0	18	0	0	0	10	0	NO ACTION
00815	MUSCODA, VILLAGE OF	BO	JGS	0.1250	133	60	5	18	0	0	0	0	0	FP RECOMMENDED
20133	NECEDAH, VILLAGE OF, UTILITY DEPARTMENT	NC	WA	0.1300	48	0	0	28	0	20	0	0	0	NO ACTION
20085	NEENAH-MENASHA SEWAGE COMMISSION	LM	JLB	18.0000	24	0	0	4	0	10	0	10	0	NO ACTION
21202	NEILLSVILLE, CITY OF	WC	MB	0.5200	82	0	0	32	0	18	20	0	0	NO ACTION
20813	NEKOOSA, CITY OF	NC	RFD	0.5000	129	15	75	38	0	0	0	0	0	FP 6-1-91
20488	NELSON SANITARY DISTRICT # 1	WC	JS	0.0380	248	55	80	20	0	0	0	0	0	FP 12-1-80
00888	NESHKORO, VILLAGE OF	BO	DJB	0.0800	83	35	0	17	0	0	0	0	0	NO ACTION
30836	NEW AUBURN, VILL OF	WC	ST	0.0830	38	0	15	8	0	0	0	0	0	NO ACTION
20984	NEW BERLIN PUBLIC SCHOOLS	SE	BZB	0.0240	80	0	5	40	0	0	0	0	0	NO ACTION
20081	NEW GLARUS WASTEWATER TREATMENT PLANT	BO	JGS	0.2550	55	15	0	40	0	0	0	0	0	FP BEING PREPARED
20683	NEW HOLSTEIN WASTEWATER TREATMENT PLANT	LM	JH	1.3300	40	0	0	30	0	8	0	10	0	NO ACTION
80080	NEW LISBON SEWAGE TREATMENT PLANT	NC	WA	0.2000	150	80	50	18	0	30	0	0	0	FP UNDER REVIEW
24829	NEW LONDON WASTEWATER PLANT	LM	MKC	1.0850	8	0	0	4	0	0	0	0	0	NO ACTION
28807	NEW MEDICO REHAB SERVICES OF WSG INC	SE	BZB	0.0250	40	0	0	40	0	0	0	0	0	NO ACTION
21245	NEW RICHMOND	WC	PS	0.0400	40	0	0	10	0	20	0	10	0	NO ACTION
24811	NEWBURG SANITARY DISTRICT (VILLAGE)	SE	JAS	0.2240	180	75	35	40	0	0	0	0	0	FACILITY PLAN
20487	NIAGARA WATER POLLUTION CONTROL CENTER	LM	BBO	0.3800	50	20	0	30	0	0	0	0	0	NO ACTION
20506	NICHOLS WASTEWATER TREATMENT PLANT	LM	MKC	0.0600	72	0	0	32	0	30	0	10	0	P&S-DECHLOR
31453	NORTH BEND S.D.#1	WC	MB	0.0100	88	45	0	12	0	0	0	0	10	NO ACTION
28011	NORTH FREEDOM SEWERAGE UTILITY	BO	JGS	0.0700	47	15	5	15	0	0	0	0	0	NO ACTION
35478	NORTH LAKE POYGAN SANITARY DISTRICT	LM	JLB	0.0300	1	0	0	1	0	0	0	0	0	NO ACTION
00879	NORTHERN MORAIN UTILITY COMMISSION	SE	JAS	0.0000	0									
81140	NORTHLAND MISSION INC.	LM	BBO	0.0450	131	45	50	20	0	0	0	0	0	ONR-08-31-90
24881	NORWALK SEWAGE TREATMENT PLANT	WC	TPS	0.1400	45	0	0	30	0	10	0	0	0	NO ACTION
31470	NORWAY TOWN S.D.#1	SE	BZB	0.7500	52	20	10	22	0	0	0	0	0	NO ACTION
31250	OAKDALE SANITARY DISTRICT	WC	TPS	0.0750	77	25	0	13	0	0	0	10	0	CONST 5-31-90
24988	OAKFIELD SEWAGE SYSTEM	BO	DJB	0.3050	37	25	0	12	0	0	0	0	0	NO ACTION
21181	OCONOMOWOC WASTEWATER TREATMENT PLANT	SE	JAS	4.0000	89	0	5	24	0	30	20	10	0	NO ACTION
22870	OCOONTO FALLS SEWAGE DISPOSAL PLANT	LM	BBO	0.3750	38	0	15	14	0	10	0	0	0	NO ACTION
22881	OCOONTO UTILITY COMMISSION	LM	BBO	1.7800	114	0	0	34	0	50	30	0	0	ONR-SLUDGE-06-30-90
28481	OGEMA SANITARY DISTRICT	NW	PE	0.0350	173	0	100	20	0	0	0	0	10	O. & M.
28011	OMRO MUNICIPAL SEWAGE TREATMENT PLANT	LM	JLB	0.5400	27	5	0	22	0	0	0	0	0	NO ACTION
28550	ONDOSAGON PUBLIC SCHOOL	NW	CLO	0.0120	0									ABANDONMENT
20753	ONTARIO SEWAGE TREATMENT PLANT	WC	TPS	0.0880	36	0	0	20	15	0	0	0	0	NO ACTION

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PERMIT NUMBER	FACILITY NAME	DIST	AREA	DESIGN FLOW	TOTAL POINTS	PART 1 POINTS	PART 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
20532	LOMIRA SEWAGE TREATMENT PLANT	SO	DJB	0.4900	137	0	85	18	0	0	0	0	0	O&M
80783	LONE ROCK, VILLAGE OF	SO	JGS	0.0570	38	15	0	0	0	0	0	0	0	NO ACTION
29271	LOWELL, VILLAGE OF	SO	DJB	0.0400	132	0	80	19	0	0	0	0	0	NO ACTION
22179	LOYAL SEWAGE TREATMENT PLANT	WC	MB	0.2000	45	5	20	0	0	0	0	0	0	NO ACTION
31917	LUBLIN, VILLAGE OF	NW	PE	0.0200	18	5	0	0	0	0	0	0	0	NO ACTION
21482	LUCK SEWAGE TREATMENT PLANT	NW	PJP	0.3650	5	0	0	3	0	0	0	0	0	NO ACTION
21011	LUXEMBURG WASTEWATER TREATMENT PLANT	LM	QWK	0.4000	44	0	15	10	0	0	0	0	0	NO ACTION
60488	LYNDON STATION	NC	WA	0.0550	94	40	0	19	0	0	0	0	0	PERMIT COMPLIANCE SCHED
31941	LYONS SAN. DIST. #2	SE	BZS	0.1000	21	0	0	16	0	0	0	0	0	NO ACTION
30788	MADLINE SANITARY DISTRICT	NW	CLO	0.1620	66	0	45	20	0	0	0	0	0	ONR-SLUDGE
24587	MADISON METROPOLITAN SEWERAGE DISTRICT	SO	GWO	60.0000	33	0	0	8	25	0	0	0	0	NO ACTION
32381	MADISON ROCK, VILLAGE OF	WC	PS	0.0220	92	10	0	0	0	0	0	0	0	NO ACTION
20688	MANAWA SEWER DEPT	LM	MKG	0.2850	34	0	0	14	0	10	0	10	0	NO ACTION
24801	MANTOWOC SEWAGE TREATMENT PLANT	LM	JH1	18.5000	24	0	0	24	0	0	0	0	0	NO ACTION
29718	MAPLE LAKE HEALTH CARE CENTER	LM	GS	0.0370	24	0	0	8	0	0	0	0	10	OPER CERT-LEAKING LAGOONS
29008	MAPLE SCHOOL DIST-NORTHWESTERN MIDDLE SCH	NW	CLO	0.0270	31	0	0	18	0	0	0	0	0	OPER CERT
29008	MAPLE SCHOOL DIST-NORTHWESTERN HIGH SCHOOL	NW	CLO	0.0275	40	0	0	25	0	0	0	0	0	NO ACTION
20273	MARATHON WATER & SEWER DEPT	NC	PH	0.3000	116	10	50	36	0	20	0	0	0	W-SLUDGE STORAGE
01051	MARBEL SEWAGE TREATMENT PLANT	LM	JH1	0.0500	41	0	0	28	0	0	0	0	0	NO ACTION
20182	MARINETTE CITY OF WASTEWATER TREATMENT PLANT	LM	BSO	4.2500	188	60	0	38	0	60	0	0	0	
20770	MARION SEWAGE TREATMENT PLANT	LM	MKG	0.2400	33	15	0	18	0	0	0	0	0	W
24818	MARKEBAN JOINT WATER AND SEWER UTILITY	SO	DJB	0.3880	17	0	0	12	5	0	0	0	0	NO ACTION
24827	MARSHALL SEWAGE TREATMENT PLANT	SO	GWO	0.3100	87	75	0	12	0	0	0	0	0	NO ACTION
21024	MARSHFIELD WASTEWATER TREATMENT PLANT	NC	RFD	3.5000	26	5	0	6	5	10	0	0	0	NO ACTION
60190	MATTOON VILL OF	LM	GS	0.0370	102	25	5	14	0	0	0	10	0	NO ACTION
24838	MAUSTON SEWAGE TREATMENT PLANT	NC	WA	0.7000	118	60	20	0	0	0	0	0	0	ONR-11-30-80
24843	MAYVILLE SEWER UTILITY	SO	DJB	1.1000	22	0	0	12	0	10	0	0	0	NO ACTION
24851	MAZOMANIE SEWAGE TREATMENT PLANT	SO	GWO	0.1800	84	0	0	34	0	50	0	0	0	ONR-SLUDGE-08-30-80
36731	MEDFORD, CITY OF	NW	PE	0.8400	2	0	0	2	0	0	0	0	0	NO ACTION
20311	MELLEN SEWAGE TREATMENT PLANT	NW	CLO	0.1400	86	70	0	2	0	0	0	0	0	ONR-FLOW BOD
24878	MELROSE SEWAGE TREATMENT PLANT	WC	MB	0.0500	143	0	100	0	0	0	0	0	0	O&M-SAMPLING
24708	MENOMONIE WASTEWATER TREATMENT PLANT	WC	ST	2.8900	58	0	50	8	0	0	0	0	0	NO ACTION
20902	MERCER, TOWN OF, & D. #1	NW	CLO	0.1000	60	0	0	40	0	10	0	0	0	FP RECOMMENDED
20180	MERRILL SEWAGE TREATMENT PLANT	NC	GWH	2.1400	30	0	0	30	0	0	0	0	0	REPLAC FUND
24732	MERRILLAM, VILLAGE OF	WC	MB	0.0680	47	0	35	0	0	0	0	0	0	NO ACTION
61042	MERRIMAC, VILLAGE OF	SO	JGS	0.0520	24	5	0	10	0	0	0	0	0	NO ACT-BY END OF 80 MONITORING WELL UPGRADE &
20742	MIDDLE RIVER HEALTH FACILITY	NW	CLO	0.0450	86	50	0	16	0	0	0	0	0	ONR-BOD REPLACEMENT FUND
31500	MILAN S.D.	NC	PH	0.0800	42	0	5	17	0	0	0	10	0	CONST UNDERWAY
22381	MILLADORE SEWAGE TREATMENT PLANT	NC	RFD	0.0430	89	30	5	22	0	0	0	0	10	ONR 12-1-80
24741	MILLTOWN SEWAGE TREATMENT PLANT	NW	PJP	0.0900	42	10	0	17	0	0	0	0	0	NO ACTION
60453	MILTON WASTEWATER TREATMENT PLANT	SO	GWO	0.8000	47	0	25	18	0	0	0	0	0	NO ACTION
24787	MILWAUKEE METROPOLITAN SEWERAGE DISTRICT J	SE	JFF	200.0000	83	0	0	34	25	0	0	0	0	NO ACTION
24778	MILWAUKEE METROPOLITAN SEWERAGE DISTRICT S	SE	JFF	120.0000	7	0	0	2	5	0	0	0	0	NO ACTION
29106	MINDORO SANITARY DISTRICT #1	WC	BE	0.0300	116	60	0	29	0	0	0	0	0	P&S AERATORS
24781	MINERAL POINT MUNICIPAL SEWAGE PLANT	SO	JGS	0.5000	22	0	0	22	0	0	0	0	0	NO ACTION
35839	MINONG, VILLAGE OF	NW	PJP	0.3000	27	0	0	12	5	0	0	0	0	NO ACTION
21389	MISHOCT WATER AND SEWER UTILITY	LM	JH1	0.1880	158	60	30	0	0	0	0	0	0	W-CONTROL CLEARWATER, PREPARE FACIL. PLAN.

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PERMIT NUMBER	FACILITY NAME	DIST	AREA ENGR	SEWER FLOW	TOTAL POINTS	PART 1 POINTS	PART 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
30388	JUDA SANITARY DISTRICT	SO	GWO	0.0400	48	25	0	0	0	0	0	0	0	NO ACTION
26079	JUNCTION CITY, VILLAGE OF	NC	WA	0.0500	140	0	100	0	0	0	0	0	0	NEW PLANT 7-90
21474	JUNEAU WASTEWATER TREATMENT PLANT	SO	DJB	0.0300	24	0	0	14	0	0	0	10	0	NO ACTION
30775	J&L OIL INC C/O HERBERT JONES	SO	DJB	0.0300	36	0	0	32	0	0	0	0	0	NO ACTION
35548	KEKOSKEE-LEROY SANITARY DISTRICT	SO	DJB	0.0375	82	55	0	0	0	0	0	0	0	O. & M.
60970	KELLNERSVILLE, VILLAGE OF	LM	JH	0.0450	21	0	0	13	0	0	0	0	0	NO ACTION
60224	KELLY LAKE S.D. #1	LM	GS	0.0800	110	30	30	0	0	0	0	0	0	FP RECOMMENDED
20518	KENDALL SEWAGE TREATMENT PLANT	WC	TPS	0.0700	56	0	0	38	0	20	0	0	0	NO ACTION
20703	KENOSHA, CITY OF, WATER UTILITY	SE	BZS	26.0000	20	0	0	10	10	0	0	0	0	NO ACTION
21733	KEWAUKUM SEWAGE TREATMENT PLANT	SE	JAS	1.0000	111	0	16	38	0	30	10	0	20	FACILITY PLAN
20178	KEWAUNEE WASTEWATER TREATMENT PLANT	LM	GWK	0.6800	24	0	0	24	0	0	0	0	0	VI-REDUCE CLEARWATER
20141	KIEL WASTEWATER TREATMENT PLANT	LM	JH	0.0620	102	70	0	12	20	0	0	0	0	NO ACTION
29289	KIELER SANITARY DISTRICT # 1	SO	JGS	0.0900	10	0	0	10	0	0	0	0	0	NO ACTION
27871	Kimberly-Clark North office	lm	js		110	0	0	40	0	20	50	0	0	no action
38421	KINGSTON, VILLAGE OF	SO	DJB	0.0213	133	0	100	0	0	0	0	0	0	NO ACTION
60600	KNAPP, VILLAGE OF	WC	ST	0.0400	43	0	0	22	0	0	0	0	0	NO ACTION
28841	KNIGHT, TOWN OF	NW	CLO	0.0320	49	20	0	17	0	0	0	0	0	NO ACTION
30485	KNOWLES MANAGEMENT CORP.	NW	CLO	0.0074	65	15	10	32	0	0	0	0	0	NO ACTION
28188	KRAKOW SANITARY DISTRICT	LM	BBO	0.1000	66	0	0	36	10	0	0	0	10	RESPOND BY 8-30-90(BYPASS, LEAKAGE AND FLOW
29581	LA CROSSE, CITY OF - BARRON ISLAND	WC	BE	0.0400	66	0	0	0	0	50	0	10	0	NO ACTION
28487	LA CROSSE CITY OF	WC	BE	20.0000	89	5	0	34	0	50	0	0	0	NO ACTION
24486	LA FAROE SEWAGE TREATMENT PLANT	WC	TPS	0.1720	18	0	0	0	0	10	0	0	0	NO ACTION
28878	LA VALLE, VILLAGE OF, SEWERAGE UTILITY FUND	WC	JGS	0.0570	86	15	30	20	0	0	0	0	0	P&S-(4-1-90)-REMOVE EFF MANHOLE
30811	LACROSSE MOBILE HOMES INC BROOKVIEW MHP/MH	WC	BE	0.0200	46	0	0	36	0	10	0	0	0	NO ACTION
21328	LADYSMITH WASTEWATER TREATMENT PLANT	NW	PE	0.0480	105	0	65	40	0	0	0	0	0	CONST UNDERWAY-NEW PLANT
21130	LAKE GENEVA WASTEWATER TREATMENT PLANT	SE	BZS	2.4360	20	15	0	0	0	0	0	0	0	NO ACTION
31184	LAKE MILLS, CITY OF	SO	GWO	1.0200	126	0	50	16	0	50	0	10	0	CONST UNDERWAY-PLANT UPGRADE, EXPANSION
31429	LAKE NEBAGAMON SEWAGE COMMISSION	NW	CLO	1.0000	43	10	0	12	0	0	0	0	0	FP RECOMMENDED
36374	LAKE TOMAHAWK SANITARY DISTRICT #1	NC	GWH		1	0	0	1	0	0	0	0	0	NO ACTION
60313	LAKE WAPOGASSET-BEAR TRAP LAKE SAN DIST	NW	PJP	0.0500	26	0	0	17	0	0	0	0	0	NO ACTION
29336	LAKELAND COLLEGE	SE	JAS	0.0600	155	35	80	40	0	0	0	0	0	FACILITY PLAN - "
61387	LAKELAND SANITARY DISTRICT NO. 1	NW	PJP	0.0125	52	40	0	12	0	0	0	0	0	NO ACTION
22637	LAKELAND S.D. #1 (WOODRUFF-MINOCQUA)	NC	GWH	0.7500	38	0	0	18	0	0	20	0	0	NO ACTION
30732	LAKEVIEW MOBILE HOME PARK	LM	JLS	0.0124	106	70	0	36	0	0	0	0	0	NO ACTION
24503	LANCASTER SEWAGE TREATMENT PLANT	SO	JGS	0.7400	17	0	0	2	15	0	0	0	0	ER BEING PREPARED
29388	LAND O LAKES SANITARY DISTRICT #1	NO	GWH	0.0800	80	5	5	40	0	0	0	0	10	OPER CERT
28582	LAONA SANITARY DISTRICT NO. 1	NO	GWH	0.1970	128	75	0	20	0	0	0	0	0	CONSTR 6-91
31925	LARSEN-WINCHESTER SAN. DIST.	LM	JLS	0.0500	24	0	10	0	0	0	0	0	0	NO ACTION
31384	LEBANON SANITARY DISTRICT	SO	DJB	0.0170	89	35	15	12	0	0	0	0	0	OPER CERT
61381	LENA SEWER UTILITY	LM	BBO	0.1250	16	0	0	16	0	0	0	0	0	NO ACTION
31826	LIBERTY SAN. DIST. #1	LM	JH	0.0400	30	0	0	14	0	0	0	0	0	NO ACTION
36447	LIME RIDGE	SO	JGS	0.0154	12	5	0	2	0	0	0	0	0	NO ACTION
21680	LINDEN SEWAGE DEPT	SO	JGS	0.0600	71	0	0	36	0	30	0	0	0	P&S-COMPOSITE SAMPLING, DISF/DECHLO, SLUDGE ST
31988	LITTLE SIAMICO SAN. DIST. #1	LM	GS	0.0480	17	0	0	0	0	0	0	0	0	NO ACTION
22187	LIVINGSTON SEWAGE DISPOSAL PLANT	SO	JGS	0.4320	22	0	10	12	0	0	0	0	0	O&M
22918	LODI SEWAGE TREATMENT PLANT	SO	DJB	0.3200	42	0	0	12	0	20	0	10	0	NO ACTION
29114	LOGANVILLE WATER & SEWER UTILITY	SO	JGS	0.0450	113	0	65	20	0	0	0	0	0	O&M

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24139	GRATIOT, VILLAGE OF	SO	JGS	0.0500	65	0	5	40	0	10	0	0	0	NO ACTION
20991	GREEN BAY METROPOLITAN SEWERAGE DISTRICT	LM	GWK	82.5000	33	0	5	28	0	0	0	0	0	NO ACTION
21776	GREEN LAKE SEWAGE TREATMENT PLANT	SO	DJB	0.2828	47	0	0	12	5	30	0	0	0	NO ACTION
20249	GREENWOOD SEWERAGE TREATMENT PLANT	WC	MB	0.2210	79	25.00	40.00	14.00	0.00	0.00	0.00	0.00	0.00	ONR LOADINGS
22781	GRESHAM SEWAGE TREATMENT PLANT	LM	GS	0.1530	80	0	50	11	0	0	0	0	0	O&M
24171	HAMMOND, VILLAGE OF	WC	PS	0.1540	38	10	0	8	0	0	0	0	5	ONR-10-30-80
35149	HANCOCK, VILLAGE OF	LM	JLS	0.0600	48	0	25	2	0	10	0	0	0	NO ACTION
35459	HARMONY GROVE - OKEE JOINT SEWERAGE COMM.	SO	DJB	0.4250	52	0	15	8	0	0	0	10	0	NO ACTION
20192	HARTFORD SEWAGE TREATMENT PLANT	SE	JAS	2.0000	52	0	10	32	0	0	0	10	0	NO ACTION
81000	HAUGEN VILLAGE OF	NW	PJP	0.2480	29	0	0	18	0	0	0	0	0	NO ACTION
24201	HAWKINS, VILLAGE OF	NW	PE	0.1180	12	0	0	0	0	0	0	0	0	P&S-SEWER REPLACEMENT
21121	HAYWARD SEWER AND WATER UTILITY	NW	PE	0.7720	17	0	0	11	0	0	0	0	0	NO ACTION
24210	HAZEL GREEN SEWAGE TREATMENT PLANT	SO	JGS	0.1750	12	0	0	12	0	0	0	0	0	NO ACTION
31232	HEART OF THE VALLEY METRO SEW DIST	LM	MKC	5.5000	57	5	0	22	0	30	0	0	0	NO ACTION
31275	HEWITT SANITARY UTILITY	NC	FRD	0.0513	250	90	90	18	0	0	0	0	0	FP 4-1-80
23051	HIDDEN MEADOWS MHP	SO	DJB	0.0380	140	80	30	30	0	20	0	0	0	NO ACTION
38780	HIGHLAND, VILLAGE	SO	JGS	0.0850	80	0	50	6	0	0	0	0	0	O&M
21270	HILBERT WASTEWATER TREATMENT PLANT	LM	JH1	0.1700	264	85	80	14	0	30	0	0	0	ONR-02-15-81
35483	HILLPOINT SANITARY DISTRICT	SO	JGS	0.0105	52	0	35	4	0	0	0	0	0	NO ACTION
20583	HILLBORO MUNICIPAL WASTE TREATMENT PLANT	WC	TPS	0.5000	27	15	0	12	0	0	0	0	0	NO ACTION
28223	HINGHAM SANITARY DISTRICT	SE	JAS	0.0500	129	0	75	34	20	0	0	0	0	P&S SUBMITTED
24236	HIXTON SEWAGE TREATMENT PLANT	WC	MB	0.0400	34	0	0	11	0	0	0	10	0	NO ACTION
28339	HOLCOMBE SD #1 C/O HOWARD PICKER	WC	BT	0.0250	98	50	0	10	0	0	0	0	0	ER 8-30-80
28207	HOLLAND (TOWN OF) SANITARY DISTRICT #1	LM	GWK	0.2000	254	220	0	24	0	10	0	0	0	NO ACTION
31330	HOLLANDALE VILLAGE OF	SO	JGS	0.0300	114	0	65	21	0	0	0	0	0	NO ACTION
24261	HOLMEN MUNICIPAL SEWER DEPT	WC	BE	0.8100	24	0	0	14	0	0	0	10	0	O&M-AMMONIA NITROGEN
28142	HOLY FAMILY CONVENT	LM	JH1	0.0000	34	0	0	34	0	0	0	0	0	NO ACTION
20231	HORWICH WASTEWATER TREATMENT PLANT	SO	DJB	0.5820	65	0	0	10	5	0	50	0	0	NO ACTION
22895	HORTONVILLE SEWAGE TREATMENT PLANT	LM	JLS	0.4900	34	0	0	14	0	20	0	0	0	NO ACTION
21679	HOWARD'S GROVE WASTEWATER TREATMENT PLANT	SE	JAS	0.2800	73	15	0	18	25	10	0	0	5	VI 7-2-80
24278	HUDSON SEWAGE TREATMENT PLANT	WC	PS	1.1000	68	0	0	8	0	50	0	10	0	P&S-FOR SLUDGE
20010	HURLEY SEWAGE TREATMENT PLANT	NW	CLO	0.4000	10	10	0	0	0	0	0	0	0	REPLACEMENT FUND
20303	HUSTISFORD SEWAGE TREATMENT PLANT	SO	DJB	0.1500	148	30	80	12	0	0	0	10	0	CONST UNDERWAY-PLANT UPGRADE
32085	HUSTLER, VILLAGE OF	NC	WA	0.0214	75	40	0	7	0	0	0	0	0	ONR 1-30-81
24287	INDEPENDENCE SEWER UTILITY	WC	BE	0.1880	18	0	0	18	0	0	0	0	0	NO ACTION
80276	INTERLAKEN RESORT VILL. C/O ANVAN CORP.	SE	BZS	0.1750	38	0	0	32	0	0	0	0	0	NO ACTION
21717	IOLA SEWER UTILITY	LM	MKC	0.2170	137	80	20	22	25	10	0	0	0	ONR-BOD-07-01-80
30538	IOWA-GRANT JOINT SCHOOL DIST	SO	JGS	0.0100	40	0	0	40	0	0	0	0	0	NO ACTION
20488	IRON RIDGE SEWAGE TREATMENT PLANT	SO	DJB	0.1170	112	10	50	24	0	0	0	0	0	NO ACTION
22448	IRON RIVER SANITARY DISTRICT #1	NW	CLO	0.0800	77	25	15	18	0	0	0	0	0	FP 12-31-81
31038	IXONIA SANITARY DISTRICT #1	SO	GW0	0.1000	77	55	0	12	0	0	0	10	0	NO ACTION
21808	JACKSON SEWAGE TREATMENT PLANT	SE	JAS	0.8700	41	0	0	18	0	10	0	10	5	FACILITY PLAN
31755	JAMESTOWN SANITARY DISTRICT #3	SO	JGS	0.0088	84	60	0	13	0	0	0	0	0	O&M
30627	JAMESTOWN SANITARY DISTRICT #2	SO	JGS	0.0100	118	15	100	1	0	0	0	0	0	NO ACTION
30380	JANESVILLE WATER POLLUTION CONTROL UTILITY	SO	GW0	17.1880	58	0	0	8	0	50	0	0	0	NO ACTION
24333	JEFFERSON WASTEWATER TREATMENT PLANT	SO	GW0	1.7000	8	0	0	8	0	0	0	0	0	NO ACTION
22181	JOHNSON CREEK, VILLAGE OF	SO	GW0	0.2800	12	0	0	12	0	0	0	0	0	NO ACTION

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00823	EVERGREEN MOB HM PK C/O DOLLINS & CO RE	SO	JGS	0.0200	122	0	80	2	0	30	0	0	0	NO ACTION
31823	EXELAND, VILLAGE OF	NW	PE	0.0273	31	15	0	8	0	0	0	0	0	O&M
36200	FAIRCHILD, VILLAGE	WC	ST	0.0610	32	0	16	6	0	0	0	0	0	NO ACTION
21440	FAIRWATER SEWAGE TREATMENT PLANT	SO	DJB	0.0500	178	75	40	17	0	0	0	0	0	ER 7-1-80
25878	FALL CREEK SEWAGE TREATMENT PLANT	WC	ST	0.1548	40	0	0	10	5	20	0	0	0	NO ACTION
23073	FALL RIVER SEWAGE TREATMENT PLANT	SO	DJB	0.1020	53	30	5	5	0	0	0	0	0	NO ACTION
23081	FENIMORE WASTEWATER TREATMENT PLANT	SO	JGS	0.0200	18	0	0	18	0	0	0	0	0	NO ACTION
31411	FENWOOD VILLAGE OF	NC	PH	0.0200	88	25	0	18	0	0	0	0	0	LEAKING LABOONS MEETING
20974	FERRYVILLE SEWAGE TREATMENT PLANT	WC	TPB	0.0400	187	80	50	28	0	0	0	0	0	5 FAC PLAN 11-1-80
00583	FIFIELD SANITARY DIST NO 1	NW	PE	0.0550	85	15	15	13	0	0	0	0	0	OPER CERT-POOR MGT OF POND LEVEL
35203	FISH CREEK SANITARY DISTRICT NO 1	LM	GWK	0.1500	82	10	40	0	0	0	0	10	0	UNDER CONSTRUCTION
22645	FLORENCE MUNICIPAL SEWER SYSTEM	LM	BBO	0.1090	28	0	0	8	0	0	0	10	0	NO ACTION
23000	FOND DU LAC WASTEWATER TREATMENT PLANT	SO	DJB	11.5000	30	0	0	24	18	0	0	0	0	NO ACTION
30000	FONKS MHP, KANSASVILLE	SE	BZB	0.0200	119	0	85	34	0	0	0	0	0	IN CONSTRUCTION
20000	FONKS MHP, YORKVILLE	SE	BZB	0.1000	11	10	0	1	0	0	0	0	0	NO ACTION
30021	FONTANA-WALWORTH WATER POLLUTION CONTRO	SE	BZB	1.7100	6	0	0	6	0	0	0	0	0	NO ACTION
24023	FOOTVILLE SEWAGE TREATMENT PLANT	SO	GWK	0.0820	88	15	35	18	0	0	0	0	0	NO ACTION
32123	FOREST JUNCTION SAN DIST	LM	JHJ	0.0290	85	35	5	9	0	0	0	0	0	VI-CONTROL INFILTRATION
00747	FOREST SANITARY DISTRICT NO 1	WC	BE	0.0075	48	0	0	20	0	0	0	0	0	CERT OPER
20004	FORESTVILLE SANITARY COMMISSION	LM	GWK	0.0600	38	5	10	12	0	0	0	0	0	VI-CONTROL CLEARWATER
22488	FORT ATKINSON SEWAGE TREATMENT PLANT	SO	GWK	2.7000	184	80	50	34	0	30	0	20	0	PLAN & SPEC 6-30-80
22420	FORT MOODY - US ARMY	WC	TPB	0.5000	65	0	5	40	0	0	0	20	0	NO ACTION
24040	FOUNTAIN CITY SEWAGE TREATMENT PLANT	WC	JS	0.2100	21	0	0	16	0	0	0	0	0	NO ACTION
31082	FOX LAKE WATER POLLUTION CONTROL COMMISSIO	SO	DJB	0.4550	92	0	40	8	10	0	0	0	0	NO ACTION
21377	FRANCIS CREEK SEWAGE TREATMENT PLANT	LM	JHJ	0.0700	19	5	0	7	0	0	0	0	0	NO ACTION
20254	FREDERIC SEWAGE TREATMENT PLANT	NW	PJP	0.2570	75	0	50	18	0	0	0	0	0	ER 8-30-80
20000	FREDONA MUNICIPAL SEWER AND WATER UTILITY	SE	JAS	0.8000	52	0	0	12	0	10	20	18	0	NO ACTION
30384	FREEDOM ELEMENTARY SCHOOL	LM	MKC	0.0150	40	0	0	40	0	0	0	0	0	NO ACTION
20842	FREEDOM WASTEWATER TREATMENT PLANT	LM	MKC	0.1772	8	0	0	8	0	0	0	0	0	NO ACTION
20158	FREMONT SEWAGE TREATMENT PLANT	LM	MKC	0.1000	108	25	100	24	0	0	0	0	0	ONR-87-01-80
31780	FRIESLAND, VILLAGE OF	SO	DJB	0.0288	88	40	0	10	0	0	0	0	0	O&M-VI
21726	GALESVILLE SEWAGE TREATMENT PLANT	WC	BE	0.3100	250	80	50	40	0	50	20	10	0	P&S SUBMIT
22288	GAYS MILLS SEWER DEPT	WC	TPB	0.0800	34	0	0	34	0	0	0	0	0	NO ACTION
21083	GENOA CITY SEWAGE TREATMENT PLANT	SE	BZB	0.2180	18	0	0	8	0	0	0	10	0	NO ACTION
22264	GENOA WATER AND SEWER DEPT	WC	TPB	0.0400	73	35	0	38	0	0	0	0	0	NO ACTION
31577	GIBBSVILLE SAN. DIST.	SE	JAS	0.0300	42	15	0	17	0	0	0	0	0	NO ACTION
22083	GILLET WATER AND SEWER COMMISSION	LM	GS	0.3350	38	0	15	12	0	0	0	0	0	NO ACTION
30937	GILMAN, VILLAGE OF	NW	PE	0.1250	18	0	5	8	0	0	0	0	0	NO ACTION
20083	GLEN FLORA, VILLAGE OF	NW	PE	0.0083	0	0	0	0	0	0	0	0	0	NO ACTION
00381	GLENWOOD CITY	WC	PS	0.2820	21	0	0	11	0	0	0	0	0	OPER CERT
20598	GLIDDEN SANITARY DISTRICT	NW	CLO	0.1000	51	20	0	18	0	0	0	0	0	NO ACTION
00844	GOODMAN SANITARY DISTRICT #1	LM	BBO	0.0800	81	15	0	40	0	10	0	18	0	S. O. & M.
20184	GRAFTON WATER AND WASTEWATER UTILITY	SE	JAS	2.1500	47	0	0	12	5	30	0	0	0	NO ACTION
24088	GRAND CHUTE-MENASHA WEST SEWERAGE COMM	LM	JLS	3.9000	37	15	0	12	0	0	0	18	0	NO ACTION
35131	GRANDVIEW S.D.	NW	CLO	0.0327	1	0	0	1	0	0	0	0	0	NO ACTION
20085	GRANTON SEWAGE TREATMENT PLANT	WC	MB	0.0000	11	0	0	0	0	0	0	0	0	NO ACTION
00428	GRANTSBURG, VILLAGE	NW	PJP	0.1250	210	80	30	21	0	0	0	0	0	NO ACTION

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22217	CUBA CITY WASTEWATER TREATMENT PLANT	SO	JGS	0.3000	16	0	0	16	0	0	0	0	0	NO ACTION
20354	CUMBERLAND MUNICIPAL DISPOSAL PLANT	NW	PJP	0.4000	30	0	0	14	0	10	0	10	0	NO ACTION
31446	CURTISS, VILLAGE OF	WC	MB	0.0120	267	70	0	12	0	0	0	0	0	F.P. UNDER REVIEW
30130	DALE & D. NO. 1	LM	JLS	0.0000	174	0	100	20	0	0	0	0	0	NO ACTION
23098	DALLAS SEWAGE DISPOSAL PLANT	NW	PJP	0.1000	32	0	0	15	0	0	0	0	0	FP 6-30-80, COMPLETE CONST 8-30-82
00577	DANE, VILLAGE	SO	GWO	0.0720	40	0	0	40	0	0	0	0	0	NO ACTION
20168	DARIEN, WATERWORKS AND SEWER SYSTEM	SE	BZB	0.1500	70	0	25	40	0	0	0	0	0	PROCEED PLANT UPGRADE
21010	DARLINGTON SEWER AND WATER UTILITY	SO	JGS	0.4340	85	45	0	10	0	0	0	0	0	NO ACTION
23787	DE PERE WASTEWATER TREATMENT PLANT	LM	GWK	14.2000	28	0	0	25	0	0	0	0	0	NO ACTION
29790	DE SOTO, VILLAGE OF	WC	TPB	0.0627	18	0	0	18	0	0	0	0	0	NO ACTION
25360	DEER PARK SEWAGE TREATMENT FACILITY	WC	PS	0.0300	46	0	0	20	0	0	0	0	0	NO ACTION
23744	DEERFIELD SEWAGE TREATMENT PLANT	SO	GWO	0.1670	77	15	0	12	0	50	0	0	0	CONST UNDERWAY-COMPLET BLU STOR TANK
30020	DELAFIELD-HARTLAND POLLUTION CONTROL COMM	SE	JAS	2.2000	26	0	0	18	0	0	0	10	0	NO ACTION
00674	DELLS BOAT COMPANY	NC	WA	0.0040	0									NOT SENT
00682	DELLS BOAT COMPANY WITCHES GULCH	NC	WA	0.0040	0									NOT SENT
21741	DENMARK WASTEWATER TREATMENT PLANT	LM	GWK	0.5000	103	00	0	18	0	20	0	0	0	FP UNDER REVIEW
00900	DEVILS HEAD LODGE	SO	JGS	0.0550	57	0	15	32	0	10	0	0	0	NO ACTION
00941	DEVI-BARA RESORT	SO	JGS	0.0200	34	0	0	21	0	0	0	0	0	NO ACTION
23017	DICKEYVILLE SEWER DEPARTMENT	SO	JGS	0.1700	10	0	0	10	0	0	0	0	0	NO ACTION
01191	DODGE SANITARY DISTRICT NO. 1	WC	BE	0.0080	215	00	100	2	0	0	0	0	0	O&M
20013	DODGEVILLE STP	SO	JGS	0.8100	48	0	40	0	0	0	0	0	0	NO ACTION
21571	DORCHESTER WASTE WATER TREATMENT PLANT	WC	MB	0.0736	165	45	55	24	0	0	0	0	0	FP UNDER REVIEW
21351	DOUSMAN SEWER UTILITY	SE	BZB	0.3500	24	0	0	14	0	0	0	10	0	NO ACTION
31002	DOWNSVILLE SAN. DIST. #1	WC	BT	0.0270	22	0	0	22	0	0	0	0	0	NO ACTION
31015	DRUMMOND SANITARY DISTRICT	NW	CLO	0.0400	61	20	0	11	0	0	0	10	0	OPER CERT
30090	DUFAND SEWERAGE DEPT	WC	PS	0.0000	14	0	0	14	0	0	0	0	0	NO ACTION
31026	EAGLE LAKE SEWER UTILITY	SE	BZB	0.4000	22	0	0	22	0	0	0	0	0	NO ACTION
22004	EAGLE RIVER LIGHT & WATER DEPT	NC	GWV	0.4750	57	0	0	32	0	10	10	0	0	REPLACEMENT FUND
20307	EAST TROY, VILLAGE OF	SE	BZB	0.7030	37	0	0	12	0	10	0	10	0	NO ACTION
23000	EAU CLAIRE WASTEWATER TREATMENT FACILITY	WC	BT	10.2000	61	0	50	10	15	0	0	0	0	NO ACTION
30710	EDEN, VILLAGE OF	SO	DJB	0.1800	34	0	15	14	0	0	0	0	0	NO ACTION
21784	EDGAR WASTE TREATMENT PLANT	NO	PH	0.1950	06	0	45	10	0	10	0	0	0	NO ACTION
20346	EDGERTON MUNICIPAL DISPOSAL PLANT	SO	GWV	0.7000	4	0	0	4	0	0	0	0	0	NO ACTION
20120	EDISON ESTATES MOBILE HOME PARK	LM	JLS	0.0100	70	30	0	40	0	0	0	0	0	NO ACTION
01200	EGG HARBOR, TOWN OF	LM	GWK	0.4300	2	0	0	2	0	0	0	0	0	NO ACTION
20720	ELCHO SANITARY DISTRICT # 1	NC	PH	0.0000	32	0	0	10	0	0	0	0	0	VI-CATTAIL CONTROLL
23002	ELEVA SEWER UTILITY	WC	BE	0.0700	79	0	45	14	0	20	0	0	0	NO ACTION
23014	ELK MOUND WATER AND SEWER UTILITY	WC	BT	0.1530	230	65	70	40	0	50	0	0	0	FP BEING PREPARED
21263	ELLSWORTH SEWAGE TREATMENT PLANT	WC	PS	0.0000	36	0	0	20	0	0	0	10	0	NO ACTION
23022	ELMWOOD SEWAGE DISPOSAL PLANT	WC	PS	0.0900	75	10	55	10	0	0	0	0	0	NO ACTION
23031	ELROY WASTEWATER TREATMENT PLANT	NC	WA	0.2440	47	15	0	12	0	10	0	10	0	NO ACTION
23040	EMBARRASS UTILITIES	LM	MKC	0.1600	0	0	0	7	0	0	0	0	0	NO ACTION
31007	EMERALD AND GLENWOOD TOWNS S.D. NO. 1	WC	PS	0.0125	20	0	0	12	0	0	0	0	10	OPER CERT
01271	EPHRAIM VILLAGE	LM	GWK	0.3000	4	0	0	4	0	0	0	0	0	NO ACTION
20021	ETTRICK SEWAGE TREATMENT PLANT	WC	BE	0.0030	72	00	0	12	0	0	0	0	0	NO ACTION
20300	EUROACTIVIDADE, SPRING GREEN	SO	JAS											NEW PLANT. 1990
23067	EVANSVILLE WASTEWATER TREATMENT PLANT	SO	GWV	0.0000	12	0	0	0	0	0	0	0	0	NO ACTION

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PERMIT NUMBER	FACILITY NAME	DIST	DATE	PERMIT FLOW	TPAL POINTS	NON-TPAL POINTS	MAX 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
20623	CAMBRIA SEWAGE TREATMENT PLANT	BO	DJB	0.1266	14	0	0	14	0	0	0	0	0	NO ACTION
20948	CAMBRIDGE WATER AND SEWER DEPT	BO	GWO	0.3430	94	60	10	11	0	0	0	0	0	ONR-LOCATE HIGH STRENGTH WASTE SOURCE
20908	CAMP AMNICON	NW	CLO	0.0018	33	0	0	16	0	0	0	0	0	NO ACTION
20918	CAMPBELLSPORT SEWAGE TREATMENT PLANT	BO	DJB	0.6300	147	0	100	11	0	0	0	0	0	CONST FINISHED
22629	CAROLINE SANITARY DISTRICT #1 STP	LM	BBO	0.0070	37	0	0	18	0	0	0	0	0	NO ACTION
31372	CASCADE VILL OF	SE	JAS	0.1072	33	0	6	20	0	0	0	0	0	NO ACTION
23606	CASCO SEWER UTILITY	LM	GWK	0.0700	30	16	0	24	0	0	0	0	0	NO ACTION
20916	CASHTON, VILLAGE OF	WC	TPS	0.2100	26	6	0	10	6	0	0	0	0	NO ACTION
21423	CASSVILLE SEWER DEPT.	BO	JGS	0.2745	70	0	0	40	0	20	0	10	0	P&S-DIS/DECHLOR SAMPLE SLUDGE
31801	CAZENOVIA, VILLAGE OF	BO	JGS	0.0460	120	60	20	10	10	0	0	0	0	ONR-06-01-80
90020	CECIL, VILL OF	LM	GS	0.0000	90	40	0	6	0	0	0	0	0	OPERT CERT/MOM
20711	CEDAR GROVE SEWAGE TREATMENT PLANT	SE	JAS	0.4200	40	0	16	16	0	0	0	0	0	NO ACTION
20222	CEDARBURG WASTE WATER	SE	JAS	3.0000	12	0	0	2	0	0	0	10	0	NO ACTION
00263	CENTURIA, VILLAGE OF	NW	PJP	0.0960	20	0	8	8	0	0	0	0	0	NO ACTION
25348	CHASEBURG SEWAGE TREATMENT PLANT	WC	TPS	0.0000	32	0	0	24	0	0	0	0	0	NO ACTION
21600	CHETEK SEWAGE TREATMENT PLANT	NW	PJP	0.3000	33	0	26	8	0	0	0	0	0	NO ACTION
30001	CHILI SANITARY DISTRICT	WC	MB	0.0600	26	0	0	21	0	0	0	0	0	NO ACTION
22700	CHILTON WASTEWATER TREATMENT PLANT	LM	JH	0.0750	96	20	66	10	0	10	0	0	0	MONITOR INDUST DISCHARGES
23004	CHIPPEWA FALLS WASTEWATER TREATMENT PLANT	WC	ST	0.6100	18	0	0	10	0	0	0	0	0	NO ACTION
30004	CHRISTMAS MOUNTAIN SAN DISTRICT	BO	JGS	0.0460	36	0	0	6	10	0	0	10	6	NO ACTION
31686	CHULA VISTA RESORT	NC	WA	0.0720	42	0	0	20	0	0	0	0	0	PERMIT COMPLIANCE SCHE
20700	CLARK COUNTY HEALTH CARE CENTER	WC	MB	0.0267	166	76	66	4	0	0	0	0	0	FP-SUBMITTAL 06-20-80
30706	CLAYTON SEWER DEPARTMENT	NW	PJP	0.0400	144	00	0	20	0	0	0	0	0	PLANS & SPEC 6-30-80
23630	CLEAR LAKE SEWAGE TREATMENT PLANT	NW	PJP	0.2404	2	0	0	2	0	0	0	0	0	NO ACTION
30040	CLEVELAND WASTEWATER TREATMENT PLANT	LM	JH	0.1600	216	00	46	40	0	30	20	0	0	FP 12-31-80
22030	CLINTON SEWAGE TREATMENT PLANT	BO	GWO	0.3060	14	0	0	4	0	10	0	0	0	NO ACTION
21406	CLINTONVILLE, CITY OF	LM	MKG	1.0000	2	0	0	2	0	0	0	0	0	NO ACTION
32000	CLOVER SANITARY DISTRICT NO. 1	NW	CLO	0.0000	116	00	0	2	0	0	0	0	0	O&M-FLOW METER
20703	CLYMAN UTILITY COMMISSION	BO	DJB	0.0600	63	0	16	27	0	0	0	0	0	NO ACTION
21407	COBB SEWER DEPT	BO	JGS	0.0000	12	0	0	8	0	0	0	0	0	NO ACTION
20214	COCHRANE SEWAGE TREATMENT PLANT	WC	JS	0.0720	11	0	0	7	0	0	0	0	0	NO ACTION
23066	COLBY SEWAGE TREATMENT PLANT	NC	PH	0.3000	191	00	60	30	10	30	0	0	0	ONR 1-1-81
22060	COLEMAN WASTEWATER TREATMENT PLANT	LM	BBO	0.2760	26	2	0	16	0	10	0	0	0	

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61336	BELL SANITARY DISTRICT NO. 1	NW	CLO	0.0000	0	0	0	0	0	0	0	0	0	REPLACEMENT FUND
23361	BELLEVILLE SEWAGE TREATMENT PLANT	SO	GWO	0.2700	42	0	0	12	0	20	0	10	0	NO ACTION
20418	BELMONT SEWAGE TREATMENT PLANT	SO	JGS	0.1100	34	0	0	14	0	20	0	0	0	NO ACTION
28930	BELOIT, TOWN OF	SO	GV/O	1.0000	25	0	0	20	5	0	0	0	0	NO ACTION
23370	BELOIT SEWER UTILITY	SO	GWO	0.6000	230	60	65	30	0	60	0	0	0	CONST UNDERWAY-NEW PLANT
20672	BENTON WATER DEPT	SO	JGS	0.1210	17	0	0	12	0	0	0	0	0	OPER CERT
21229	BERLIN MUNICIPAL WASTEWATER TREATMENT PLANT	SO	DJB	1.6000	86	60	0	16	0	0	0	10	0	NO ACTION
31313	BETHEL LIVING CENTER	NC	RPD	0.0150	57	15	0	28	0	0	0	0	0	DAM-DIKE MAINT., SLUDGE REMOVAL
60003	BIRCHWOOD, VILLAGE OF	NW	PJP	0.8520	49	0	25	0	0	0	0	0	0	NO ACTION
22881	BIRNAMWOOD SEWER UTILITY	LM	BBO	0.0771	151	15	90	38	0	10	0	0	0	FP 12-31-90
21041	BLACK CREEK WASTEWATER TREATMENT PLANT	LM	MKG	0.4750	32	0	10	22	0	0	0	0	0	NO ACTION
23086	BLACK EARTH SEWAGE PLANT	SO	GWO	0.1620	44	0	0	34	0	0	0	10	0	NO ACTION
21854	BLACK RIVER FALLS WASTE TREATMENT PLANT	WC	MB	0.8800	189	65	20	34	0	50	0	0	0	NO ACTION
21105	BLANCHARDVILLE, VILLAGE OF	SO	JGS	0.1092	177	60	30	32	0	30	0	0	0	CONST UNDERWAY
31950	BLECKER-SHERRY SAN. DIST.	NC	RPD	0.0300	10	0	0	10	0	0	0	0	0	NO ACTION
20575	BLOOMER WASTEWATER TREATMENT PLANT	WC	BT	0.8530	58	0	0	38	0	10	0	10	0	NO ACTION
30405	BLOOMFIELD MANOR	SO	JGS	0.0350	173	68	65	30	0	0	0	0	0	FP 5-31-90
23400	BLOOMINGTON SEWAGE TREATMENT PLANT	SO	JGS	0.0920	10	0	0	10	0	0	0	0	0	NO ACTION
21858	BLUE MOUNDS, VILLAGE OF	SO	GWO	0.0720	52	0	10	22	5	0	0	10	0	NO ACTION
23418	BLUE RIVER SEWAGE TREATMENT PLANT	SO	JGS	0.0400	84	0	20	34	0	0	0	10	0	NO ACTION
60992	BLUFFVIEW ACRES, INC.	SO	JGS	0.0348	181	80	15	18	0	0	0	0	0	FP RECOMMENDED
23426	BONDUEL, VILL OF	LM	BBO	0.2590	88	0	0	38	0	30	0	0	0	ONR-08-31-90
22110	BOGOSBEL WASTEWATER TREATMENT PLANT	SO	JGS	0.4748	58	0	0	10	0	30	0	10	0	NO ACTION
28908	BOSTWICK VALLEY MOBILE HOME PK	WC	BE	0.0200	40	0	0	40	0	0	0	0	0	NO ACTION
21237	BOWLER WATER & SEWER UTILITY	LM	BBO	0.0700	44	0	0	20	0	0	0	0	0	NO ACTION
60330	BOYCEVILLE, VILLAGE	WC	BT	0.1200	98	0	50	2	0	0	0	10	0	P&S-TO BE SUBMITTED
21261	BOYD SEWAGE TREATMENT PLANT	WC	BT	0.0671	88	40	0	10	0	10	0	0	0	NO ACTION
23442	BRANDON UTILITIES	SO	DJB	0.1880	81	35	0	18	10	20	0	0	0	NO ACTION
61026	BRAZEAU TNS & D NO 1	LM	GB	0.0500	21	0	0	13	0	0	0	0	0	NO ACTION
60348	BRIGHTON DALE CTY PK	BE	BZS	0.0160	35	0	0	35	0	0	0	0	0	NO ACTION
29246	BRILL SCHOOL, RICE LAKE SCHOOL SYSTEM	NW	PJP	0.0020	60	20	0	40	0	0	0	0	0	NO ACTION
20443	BRILLION SEWAGE TREATMENT PLANT	LM	JHJ	0.7140	21	5	0	15	0	0	0	0	0	NO ACTION
22021	BRISTOL UTILITY DISTRICT #1 & 1B	BE	BZS	0.4800	67	25	35	2	25	0	0	0	0	NO ACTION
21803	BROCKHEAD SEWAGE TREATMENT PLANT	SO	JGS	0.6000	29	0	15	14	0	0	0	0	0	NO ACTION
22136	BROKAW SEWAGE TREATMENT PLANT	NC	PH	0.0700	140	0	65	40	15	0	0	0	0	CONST TO START
23469	BROOKFIELD, FOX WATER POLLUTION CONTROL CT	BE	JAB	10.0000	28	0	0	8	0	0	10	10	0	NO ACTION
23485	BROOKLYN SEWAGE TREATMENT PLANT	SO	GWO	0.0800	18	0	0	18	0	0	0	0	0	NO ACTION
60054	BROOKWOOD H S, NORWALK - ONTARIO SCHOOLS	WC	TPS	0.0070	114	10	0	58	0	0	0	5	0	NO ACTION
21801	BROWNSVILLE SEWAGE TREATMENT PLANT	SO	DJB	0.0760	110	0	75	8	0	0	0	0	0	NO ACTION
32051	BROWNTOWN, VILLAGE OF	SO	GWO	0.0405	58	0	30	14	0	0	0	0	0	NO ACTION
60143	BRUCE WATER & SEWER UTILITY	NW	PE	0.1000	14	0	0	8	0	0	0	0	0	NO ACTION
61156	BRULE SAN. DIST. #1	NW	CLO	0.0188	35	25	0	10	0	0	0	0	0	REPLACEMENT FUND
22829	BURLINGTON WASTEWATER TREATMENT PLANT	BE	BZS	2.6000	152	82	0	40	0	50	0	0	0	NO ACTION
31551	BURNETT SANITARY DISTRICT	SO	DJB	0.0381	95	20	35	17	0	0	0	0	0	W-CONTROL CLEARWATER & ALGAE
30821	BUTTE DES MORTS S. D. # 1	LM	JLS	0.0108	88	80	0	38	0	0	0	0	0	NO ACTION
20856	BUTTERNUT SEWAGE TREATMENT FACILITY	NW	CLO	0.0000	68	35	0	8	0	0	0	0	0	W
23515	CADOTT, VILLAGE OF	WC	BT	0.1770	10	0	0	10	0	0	0	0	0	NO ACTION

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PERMIT NUMBER	FACILITY NAME	DIS	PH	END FLOW	TOTAL POINTS	PART POINTS	PART 1 POINTS	PART 2 POINTS	PART 3 POINTS	PART 4 POINTS	PART 5 POINTS	PART 6 POINTS	PART 7 POINTS	PART 8 POINTS	RECOMMENDATION BY AREA ENGINEER
23141	ABBOTSFORD DISPOSAL PLANT	NC	PH	0.2070	66	60	0	6	0	10	0	0	0	0	NO ACTION
23159	ADAMS WATER AND SEWER UTILITY	NC	WA	0.3000	81	0	15	36	0	30	0	0	0	0	ONR-SLUDGE STORAGE
00127	ADELL, VILLAGE	SE	JAS	0.1000	60	0	0	40	0	30	0	0	0	0	NO ACTION
21189	ALBANY, VILLAGE OF	SO	GWO	0.1200	112	0	65	18	0	0	0	0	0	0	ONR
20745	ALGOMA, CITY OF SEWAGE DISPOSAL PLANT	LM	GVK	0.7500	60	10	0	40	0	0	0	0	0	0	F.P. UNDER REVIEW
28053	ALLENTON SANITARY DISTRICT #1	SE	JAS	0.3800	0										NOT SENT- NO ACTION
22101	ALMA, CITY OF MUNICIPAL WASTEWATER PLANT	WC	JS	0.1230	19	0	0	14	5	0	0	0	0	0	NO ACTION
21365	ALMA CENTER, VILLAGE OF	WC	MB	0.0700	82	0	50	12	0	0	0	0	0	0	O&M-SEEPAGE BED MAINT.
23183	ALMENA	NW	PJP	0.1430	42	0	15	17	0	0	0	0	0	0	UPGRADE DISINFECTION FAC 4-30-92
00780	ALMOND VILLAGE	NC	WA	0.0600	227	80	50	12	0	0	0	0	0	0	FP BEING PREPARED
00206	ALPINE VALLEY RESORT INC	SE	BZB	0.0400	125	40	25	40	0	0	0	0	0	0	ABANDON LATE '90
01077	ALPINE VALLEY RESORT INC. (MUSIC-THEATER)	SE	BZB	0.1000	27	0	0	24	0	0	0	0	0	0	ABANDON LATE '90
31881	AMANI SANITARY DISTRICT	NW	PJP	0.0080	07	0	0	32	0	0	0	0	0	10	UPGRADE INFLUENT FLOW MONIT. 12-31-90
00681	AMERICAN BAPTIST ASSEMBLY	SO	DJB	0.1800	44	0	0	34	0	0	0	0	0	0	NO ACTION
00291	AMERICAN MOBILE HOME COMMUNITIES	SE	JAS	0.0388	41	0	0	36	0	0	0	0	0	0	NO ACTION
20327	AMERICANA-WISCONSIN CORPORATION	SE	BZB	0.6000	36	0	0	36	0	0	0	0	0	0	NO ACTION
20125	AMERY SEWER DEPT.	NW	PJP	0.5700	36	0	0	18	0	20	0	0	0	0	ONR 8-30-90
23213	AMHERST SEWAGE TREATMENT PLANT	NC	WA	0.1400	85	0	15	40	0	30	0	0	0	0	NO ACTION
31747	ANDERSON SANITARY DISTRICT #2	NW	CLO	0.0500	47	0	0	20	0	0	0	10	0	0	OPER CERT
22144	ANTIGO, CITY OF	NC	PH	2.4700	40	0	0	20	0	0	20	0	0	0	NO ACTION
23221	APPLETON WASTE WATER TREATMENT PLANT	LM	MKC	10.5000	87	0	15	22	20	10	0	0	0	0	CONST UNDERWAY
23230	ARCADIA WASTE WATER TREATMENT PLANT	WC	BE	0.7000	129	0	80	0	0	0	0	0	0	0	NO ACTION
00704	ARENA VILLAGE	SO	JGS	0.0500	36	0	5	17	0	0	0	0	0	0	NO ACTION
22225	ARGYLE WASTE WATER TREATMENT PLANT	SO	JGS	0.1000	61	0	15	36	0	10	0	0	0	0	NO ACTION
00232	ARKANSAS SANITARY DISTRICT	WC	PS	0.0440	106	80	10	6	0	0	0	0	0	0	ONR-12-31-90
21512	ARLINGTON STP	SO	DJB	0.0500	82	80	0	12	0	0	0	0	0	0	O&M REPLACEMENT FUND
31287	ARPIN, VILLAGE OF	NC	RPD	0.0557	29	20	0	2	0	0	0	0	0	0	NO ACTION
31809	ARROWHEAD CAMPGROUND	NC	WA	0.0258	0										NOT SENT
31381	ASHIPPUN SANITARY DISTRICT	SO	DJB	0.0710	164	0	100	18	0	0	0	0	0	0	OPER CERT
30787	ASHLAND, CITY OF	NW	CLO	1.6000	119	20	0	34	25	30	0	10	0	0	NO ACTION
22365	ATHENS SEWAGE TREATMENT PLANT	NC	PH	0.1050	10	0	0	8	0	0	0	0	0	0	NO ACTION
22411	AUBURNDALE SEWAGE TREATMENT FACILITY	NC	RPD	0.1200	36	0	15	6	5	0	0	0	0	0	NO ACTION
23272	AUGUSTA SEWAGE TREATMENT PLANT	WC	ST	0.3300	25	0	5	20	0	0	0	0	0	0	NO ACTION
31852	AURORA SANITARY DISTRICT #1	LM	BSO	0.0468	136	0	80	14	0	0	0	0	0	0	Aeration O&M
00181	AVOCA, VILLAGE	SO	JGS	0.0220	82	40	0	11	0	0	0	0	0	0	GW MONITORING WELLS 12-31-90
00771	BAGLEY SEWER AND WATER	SO	JGS	0.4900	24	0	5	14	0	0	0	0	0	0	OPER CERT.
29751	BAILEYS HARBOR YACHT CLUB, INC.	LM	GVK	0.0487	2	0	0	2	0	0	0	0	0	0	NO ACTION
20881	BALDWIN STP	WC	PS	0.2820	56	40	0	6	0	10	0	0	0	0	NO ACTION
20848	BALSAM LAKE SEWAGE TREATMENT PLANT	NW	PJP	0.1200	80	0	15	17	0	0	0	0	0	0	NO ACTION
31224	BANGOR, VILL OF	WC	BE	0.1895	18	0	0	18	0	0	0	0	0	0	NO ACTION
20806	BARABOO SEWAGE TREATMENT PLANT	SO	JGS	2.1800	134	80	0	14	0	60	10	0	0	0	ER RECOMMENDED
29131	BARNEVELD, VILLAGE OF	SO	JGS	0.0800	88	15	0	27	0	0	0	10	0	0	NO ACTION
21887	BARRON SEWAGE PLANT	NW	PJP	1.3730	88	0	60	11	0	0	0	0	0	0	NO ACTION
29063	BAYFIELD, CITY OF	NW	CLO	0.2000	56	20	0	36	0	0	0	0	0	0	REPLACEMENT FUND
29081	BEAR CREEK VILLAGE	LM	MKC	0.0980	32	0	0	12	0	20	0	0	0	0	NO ACTION
23346	BEAVER DAM WASTEWATER TREATMENT PLANT	SO	DJB	3.5000	23	0	0	8	5	10	0	0	0	0	NO ACTION
23383	BELGUM SEWAGE TREATMENT PLANT	SE	JAS	0.3800	30	15	0	8	0	0	0	0	0	0	NO ACTION

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80097	WOODVILLE VILLAGE OF	WC	PS	0.1080	19	0	5	7	0	0	0	0	0	NO ACTION
80135	WORLDWIDE CHURCH OF GOD	NC	WA	0.0900	29	0	0	18	0	0	0	0	0	O&M
22367	WRIGHTSTOWN, TOWN OF S. D. #2	LM	GWK	0.0100	59	0	25	19	0	0	0	0	0	W-CONTROL CLEARWATER
22438	WRIGHTSTOWN SAN DIST NO 1	LM	GWK	0.0400	75	36	0	40	0	0	0	0	0	NO ACTION
22487	WRIGHTSTOWN SEWER & WATER UTILITY	LM	GWK	0.3000	18	0	0	18	0	0	0	0	0	NO ACTION
80869	WYOCENA VILLAGE OF	BO	DJB	0.1220	55	0	15	20	0	0	0	0	0	NO ACTION
20831	YORKVILLE SEWER UTILITY DISTRICT NO. 1	BE	BZB	0.1800	22	0	0	12	0	0	0	0	10	NO ACTION

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TEXAS

PROGRAM OBJECTIVES

In September 1985, the Texas Department of Water Resources was reorganized into two agencies: the Texas Water Development Board and the Texas Water Commission. At this time, the Texas Water Commission was charged with the responsibility of protecting water quality in Texas. The Texas legislature instructed the Texas Water Commission to create two new programs. One, the Mandatory Enforcement Hearing Program, is designed to identify permittees in non-compliance with their permit limits. The other, the 75-90% Program, is designed to identify permittees with the potential to begin violating their permit limits in the near future. The Texas Water Commission adopted the rule for the program, 31 Texas Administrative Code Chapter 305 "Consolidated Permits," on June 19, 1986 (Exhibit 1).

The objective of the 75-90% Program is to encourage permittees to plan and construct adequate wastewater treatment capacity to meet existing and future needs. By ensuring that facilities have adequate flow capacity, the problem of hydraulic and organic overloads which affect wastewater treatment and effluent quality can then be prevented.

PLANNING PROCESS

The Texas Water Commission planned its 75-90% Program as an expansion of ideas and programs already in place in the State. For example, the rule which the Texas Water Commission adopted to initiate the program is based on rules in place near Houston at the Lake Houston Watershed to protect that source of drinking water from pollution from the rapid industrial growth the area experienced in the 1970's. The Texas Water Commission decided to base its program on facility design flow because their permit system already requires the facilities to submit their daily average flow to the Commission on a monthly basis. The Texas Water Commission determined that the information generated by this requirement could create an efficient and inexpensive early warning system to alert facilities of the need to

plan for necessary expansion. Finally, the Texas Water Commission developed a tracking system to determine which facilities exceed either 75% or 90% of their design flow. The tracking system was developed by fine tuning existing computer programs for the mainframe database of self-reported flow data.

The Texas Water Commission decided that compliance with the rule should be mandatory for all permitted facilities so that all the facilities receive equal treatment. Currently only facilities which apply for and receive a waiver are exempt from the rule's requirements.

The Texas Water Commission encountered very few problems in planning and designing its 75-90% Program.

PUBLIC OUTREACH

Because the program is an extension of existing programs, the Texas Water Commission did not actively solicit the participation of the permitted facilities in program development. The regulated facilities and the public had the opportunity to comment on the proposed rule in the standard comment period.

75-90% PROGRAM DESIGN

The 75-90% Program is based on self-reported flow data submitted by permittees on a monthly basis. A computer program identifies those municipal facilities that exceed 75% or 90% of the permitted flow for three consecutive months. The resulting data is reviewed by the program coordinator who sends computer-generated letters to facilities nearing their maximum permitted flow (Exhibit 2). Each letter contains the flow data for the three months that exceed 75% or 90% of permitted flow, relevant excerpts from the rule, an explanation of how to comply with the rule, and an explanation of who is eligible for a waiver of the requirements and how to apply for one.

Although the Texas Water Commission acknowledges that the self-reported flow data may not be entirely accurate, they believe that this program has actually improved the quality of data that the Commission receives. For example, many of the facilities that have been issued a warning letter discover that their flow meters are incorrectly calibrated. Once this type of problem is resolved, the facility is able to report more accurate data to the Commission. The Texas Water Commission does not believe intentional mis-reporting of data is a problem due to the existence of strong deterrents.

At 75% of permitted flow, the 75-90% Program requires a permittee to initiate engineering and financial planning for expansion and/or upgrading of the facility. At 90% of the permitted flow, permittees are required to obtain necessary authorization from the Texas Water Commission to begin construction of the planned expansion and/or upgrade. In both cases, the permittee must provide information about any court, Texas Water Commission, or EPA order requiring expansion or upgrading of the present treatment facilities which the facility is currently under, along with projected dates for commencing construction. Likewise, the permittee must submit planning information and anticipated dates for construction if the facility is pursuing any engineering and financial planning for expansion and/or upgrade on its own. At 90% of the permitted flow, the permittee must submit dates for any necessary permit applications in addition to the requirements described above. In both cases, the permittee may be exempt from the requirements if granted a waiver.

A facility may be granted a waiver of the requirements if the planned population to be served or the quantity of waste produced is not expected to exceed the design limitations of the treatment facility. If a facility chooses to apply for a waiver, it must submit an engineering report supporting its claim to the executive director of the Texas Water Commission. An application for a waiver must include:

- the estimated percentage of flow contributed by industrial, commercial, municipal, and residential users;

- the projected 30-day average influent flow rate to the treatment plant at the permit expiration date based on population projection, anticipated addition and/or withdrawal of industrial, commercial, and/or municipal users over the duration of the permit;
- the 30-day average influent 5-day Biochemical Oxygen Demand and Total Suspended Solids concentration for each of the past 12 months;
- the number of unauthorized discharges (bypasses) from the sewage treatment plant for the past year, their estimated quantity and duration, and the circumstances surrounding each bypass;
- a schematic of the treatment plant showing its layout, including the dimensions and design capacity of each treatment unit;
- the number of excursions for the past 24 months from the permitted parameters set forth in the permit;
- the age of the collection system and treatment plant;
- any sewer system evaluation surveys (SSES) and/or infiltration and inflow (I/I) studies conducted during the past five years; and
- any future plans for the expansion or rehabilitation and/or new construction including a timetable.

To be valid, the waiver must be in writing and signed by the director of the water quality division of the Texas Water Commission. A waiver of the requirements of the 75-90% rule is reviewed upon the expiration of the existing permit.

A response to the warning letter is required within 90 days of the date of the letter. The program coordinator tracks both the date of the initial letter and the response letter and either ensures that a waiver request contains the necessary information and is approved or denied, or tracks the milestone dates indicated in the permittee's response. If the program coordinator does not receive a response to the letter within 90 days, a second notice letter is mailed and the permittee is given 30 days to respond. The appropriate Texas Water Commission District Office is then notified if no response is received to a second letter at a facility exceeding 75% of flow capacity. The District Office usually discusses this matter with the permit holder at their next regularly scheduled district inspection. If a facility exceeding 90% of flow capacity does not respond to a second letter, the permittee is referred to the enforcement unit with the request that formal enforcement action be initiated based on failure to comply with the rule. The enforcement unit may then call in the permittee for a meeting and place the facility under an order for corrective action.

RESOURCE INFORMATION

The 75-90% Program required minimal new funding. The State provided the salary for one full time employee who is responsible for tracking the facilities, sending the warning letters, and tracking the responses. The current program coordinator has approximately eight years of experience with the Texas Water Commission and has spent approximately half of that time working in the Wastewater Enforcement Section.

PROGRAM EFFECTIVENESS

Since 1985, the Texas Water Commission has identified and notified at least 357 permittees in non-compliance with the rule. Of these 357 permittees, 46 are currently being tracked through a previously issued enforcement order; 106 have complied with program requirements; and 205 are currently being tracked in the 75-90% Program by the program coordinator. 49 of the 205 permittees being tracked *in the program* have requested a waiver, and the remaining 151 are in some stage of plant and/or

collection system planning or construction. Formal enforcement action has only been requested against five permittees for failure to comply with the rule. The Texas Water Commission is very pleased with the high rate of compliance from permit holders.

In the first year of the program an average of twenty letters per month were sent out to facilities at 90% of design flow capacity (Exhibit 3). This rate has since dropped to less than ten letters per month, although recent severe weather and flooding are expected to increase the number of facilities near their design flow capacity. This program is considered to be a success as a result of the decreasing number of warning letters and the small number of requests for formal enforcement action.

For more information on the Texas 75-90% Program, contact:

**Ms. Jennifer Sidnell
Chief, Wastewater Enforcement Section
Texas Water Commission
(512) 463-8207.**

EXHIBIT 1

Excerpt from

**31 Texas Administrative Code Chapter 305
"Consolidated Permits"**

adopted by the Texas Water Commission June 19, 1986

§305.126. Additional Standard Permit Conditions for Waste Discharge Permits. Whenever flow measurements for any sewage treatment facility in the state reaches 75 percent of the permitted average daily flow for three consecutive months, the permittee must initiate engineering and financial planning for expansion and/or upgrading of the wastewater treatment and/or collection facilities. Whenever, the average daily flow reaches 90 percent of the permitted average daily flow for three consecutive months, the permittee shall obtain necessary authorization from the Texas Water Commission to commence construction of the necessary additional treatment and/or collection facilities. In the case of a wastewater treatment facility which reaches 75 percent of the permitted average flow for three consecutive months, and the planned population to be served or the quantity of waste produced is not expected to exceed the design limitations of the treatment facility, the permittee will submit an engineering report supporting this claim to the executive director. If in the judgment of the executive director the population to be served will not cause permit noncompliance, then the requirements of this section may be waived. To be effective, any waiver must be in writing and signed by the director of the water quality division of the Texas Water Commission, and such waiver of these requirements will be reviewed upon expiration of the existing permit. However, any such waiver shall not be interpreted as condoning or excusing any violation of any permit parameter.

EXHIBIT 2

Letter Sent at 75% of Permitted Flow

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
John E. Birdwell, Commissioner
Cliff Johnson, Commissioner

John J. Vay, General Counsel
Michael E. Field, Chief Hearings Examiner
Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

April 23, 1990

Dear Permittee:

Failure to plan and construct adequate wastewater treatment capacity to meet existing and future needs is a major factor leading to hydraulic and organic overloads affecting wastewater treatment and effluent quality. The Texas Water Commission (TWC), realizing this to be a major problem affecting permit compliance, promulgated rules which were felt to be necessary in order to preserve and protect the quality of the state water resources.

On June 19, 1986 the Texas Water Commission adopted 31 Texas Administrative Code (TAC) Chapter 305 entitled "Consolidated Permits". Section 305.126 states, in pertinent part, "Whenever flow measurements for any sewage treatment facility in the state reaches 75 percent of the permitted average daily flow for three consecutive months, the permittee must initiate engineering and financial planning for expansion and/or upgrading of the wastewater treatment and/or collection facilities". Section 305.126 further states, "In the case of a wastewater treatment facility which reaches 75 percent of the permitted average flow for three consecutive months, and the planned population to be served or the quantity of waste produced is not expected to exceed the design limitations of the treatment facility, the permittee will submit an engineering report supporting this claim to the executive director. If in the judgment of the executive director the population to be served will not cause permit noncompliance, then the requirements of this section may be waived. To be effective, any waiver must be in writing and signed by the director of the water quality division of the Texas Water Commission and such waiver of these requirements will be reviewed upon expiration of the existing permit. However, any such waiver shall not be interpreted as condoning or excusing any violation of any permit parameter."

In order to implement Chapter 305 cited above, a review of your wastewater treatment facility flow records was conducted for the time period 03/1989 through 07/1989. Self monitoring report records show that the daily average flow reached or exceeded 75% of the design capacity (permitted daily average flow) of the wastewater treatment plant for each of the three months based on the following information:

Permit Number WQ0010396-001

Month	Permitted Flow (MGD)	Reported Flow (MGD)
03/1989	0.400000	0.344000
06/1989	0.400000	0.445000
07/1989	0.400000	0.337000

Please read the following completely and then answer the appropriate questions concerning your wastewater treatment facilities. Should you have any questions please feel free to contact Ms. Jan Sills of the Wastewater Enforcement Section at (512)475-2185.

1. Are you currently under a Court, TWC or EPA Order requiring you to expand/upgrade your present treatment facilities? yes/no

If you answered yes, please provide information including projected dates for expanding/upgrading facilities.

2. If you answered no to question #1, are you at this time pursuing engineering and financial planning for expansion and/or upgrading of the wastewater treatment and/or collection facilities? yes/no

If your answer is yes, please explain, providing time schedules for securing funding and schedules for submitting appropriate engineering plans to the TWC or other state agencies for approval.

3. If you answered no to question #2, you are required to initiate financial and engineering planning for expansion and/or upgrading of the wastewater treatment and/or collection facilities provided you do not seek a waiver as provided in the rules. Should you not seek such a waiver, please provide a detailed plan with time schedules for complying with this requirement. Should you choose to seek a waiver from the requirements of this rule, you are required to submit an engineering report to the Texas Water Commission which supports the claim that the planned population to be served or the quantity of waste produced will not cause permit noncompliance. This report shall include, at a minimum, the following information:

- a. estimated percentage of flow contributed by industrial, commercial, municipal (schools, convention centers, etc.) and residential users;
- b. projected 30-day average influent flow rate to the treatment plant at the permit expiration date. This figure to be based on, but not limited to, the population projection, the anticipated addition and/or withdrawal of any industrial, commercial and/or municipal users to the service area over the duration of the permit;
- c. 30-day average influent 5-day Biochemical Oxygen Demand and Total Suspended Solids concentration for each of the past 12 months;
- d. number of unauthorized discharges (bypasses) from the sewage treatment plant for the past year, their estimated quantity and duration, and the circumstances surrounding each bypass event;
- e. schematic of the treatment plant showing its layout. This should also include the dimensions and design volumetric capacity of each treatment unit;

Page 3

- f. number of excursions for the past 24 months from the permitted parameters set forth in the permit;
- g. age of the collection system and treatment plant;
- h. any sewer system evaluation surveys (SSES) and/or infiltration and inflow (I/I) studies conducted during the past five years; and
- i. future plans for the expansion/rehabilitation and/or construction of any new facilities including a timetable.

Please send your written response to the Wastewater Enforcement Section, Texas Water Commission, Attention, Ms. Jan Sills, P. O. Box 13057, Capitol Station, Austin, Texas 78711, and to the appropriate District office, within 90 days after the date of this letter.

Sincerely,

Jennifer Sidnell, Chief
Wastewater Enforcement Section
Water Quality Division

TGH

cc: TWC - SER, Deer Park

Letter Sent at 90% of Permitted Flow
TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
John E. Birdwell, Commissioner
Cliff Johnson, Commissioner

John J. Vay, General Counsel
Michael E. Field, Chief Hearings Examiner
Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

January 18, 1990

Dear Permittee:

Failure to plan and construct adequate wastewater treatment capacity to meet existing and future needs is a major factor leading to hydraulic and organic overloads affecting wastewater treatment and effluent quality. The Texas Water Commission (TWC), realizing this to be a major problem affecting permit compliance, promulgated rules which were felt to be necessary in order to preserve and protect the quality of the state water resources.

On June 19, 1986 the Texas Water Commission adopted 31 Texas Administrative Code (TAC) Chapter 305 entitled "Consolidated Permits". Section 305.126 states, in pertinent part, "Whenever the average daily flow reaches 90 percent of the permitted average daily flow for three consecutive months, the permittee shall obtain necessary authorization from the Texas Water Commission to commence construction of the necessary additional treatment and/or collection facilities. In the case of a wastewater treatment facility which reaches 75 percent of the permitted average flow for three consecutive months, and the planned population to be served or the quantity of waste produced is not expected to exceed the design limitations of the treatment facility, the permittee will submit an engineering report supporting this claim to the executive director. If in the judgment of the executive director the population to be served will not cause permit noncompliance, then the requirements of this section may be waived. To be effective, any waiver must be in writing and signed by the director of the water quality division of the Texas Water Commission and such waiver of these requirements will be reviewed upon expiration of the existing permit. However, any such waiver shall not be interpreted as condoning or excusing any violation of any permit parameter."

In order to implement Chapter 305 cited above, a review of your wastewater treatment facility flow records was conducted for the time period 01/89 through 03/1989. Your self monitoring report records show that the daily average flow reached or exceeded 90% of the design capacity (permitted daily average flow) of the wastewater treatment plant for each of the three months based on the following information:

Permit Number WQ0010258-002

Month	Permitted Flow (MGD)	Reported Flow (MGD)
01/1989	.750000	.733000
02/1989	.750000	.726000
03/1989	.750000	.698000

Please read the following completely and then answer the appropriate questions concerning your wastewater treatment facilities. Should you have any questions please feel free to contact Ms. Jan Sills of Wastewater Enforcement Section at (512)475-2185.

1. Are you currently under a Court, TWC or EPA Order requiring you to expand/upgrade your present treatment facilities? yes/no

If you answered yes, please provide information including projected dates for submitting any necessary permit application and dates for commencing construction to expand/upgrade your treatment facilities.

2. If you answered no to question #1, are you at this time pursuing engineering and financial planning for expansion and/or upgrading of the wastewater treatment and/or collection facilities? yes/no

If you answered yes, please provide information including projected dates for submitting any necessary permit applications and anticipated dates for commencing construction to expand/upgrade your treatment facilities.

3. If you answered no to question #2, you are required to obtain necessary authorization from the Texas Water Commission to commence construction of the necessary additional treatment and/or collection facilities when the average daily flow reaches 90 percent of the permitted average daily flow for three consecutive months provided you do not seek a waiver as provided in the rule. Should you not seek such a waiver, please provide a detailed plan with time schedules for complying with the requirement. Should you choose to seek a waiver from the requirements of this rule, you are required to submit an engineering report to the Texas Water Commission which supports the claim that the planned population to be served or the quantity of waste produced will not cause permit noncompliance. This report shall include, at a minimum, the following information:

- a. estimated percentage of flow contributed by industrial, commercial, municipal (schools, convention centers, etc.) and residential users;
- b. projected 30-day average influent flow rate to the treatment plant at the permit expiration date. This figure to be based on, but not limited to, the population projection, the anticipated addition and/or withdrawal of any industrial, commercial and/or municipal users to the service area over the duration of the permit;
- c. 30-day average influent 5-day Biochemical Oxygen Demand and Total Suspended Solids concentration for each of the past 12 months;
- d. number of unauthorized discharges (bypasses) from the sewage treatment plant for the past year, their estimated quantity and duration, and the circumstances surrounding each bypass event;

- e. schematic of the treatment plant showing its layout. This should also include the dimensions and design volumetric capacity of each treatment unit;
- f. number of excursions for the past 24 months from the permitted parameters set forth in the permit;
- g. age of the collection system and treatment plant;
- h. any sewer system evaluation surveys (SSES) and/or infiltration and inflow (I/I) studies conducted during the past five years; and
- i. future plans for the expansion/rehabilitation and/or construction of any new facilities including a timetable.

Please send your written response to the Wastewater Enforcement Section, Attention: Ms. Jan Sills, Texas Water Commission, P. O. Box 13087, Capitol Station, Austin, Texas 78711, and to the appropriate District office, within 90 days after the date of this letter.

Sincerely,

Jennifer Sidnell, Chief
Wastewater Enforcement Section
Water Quality Division

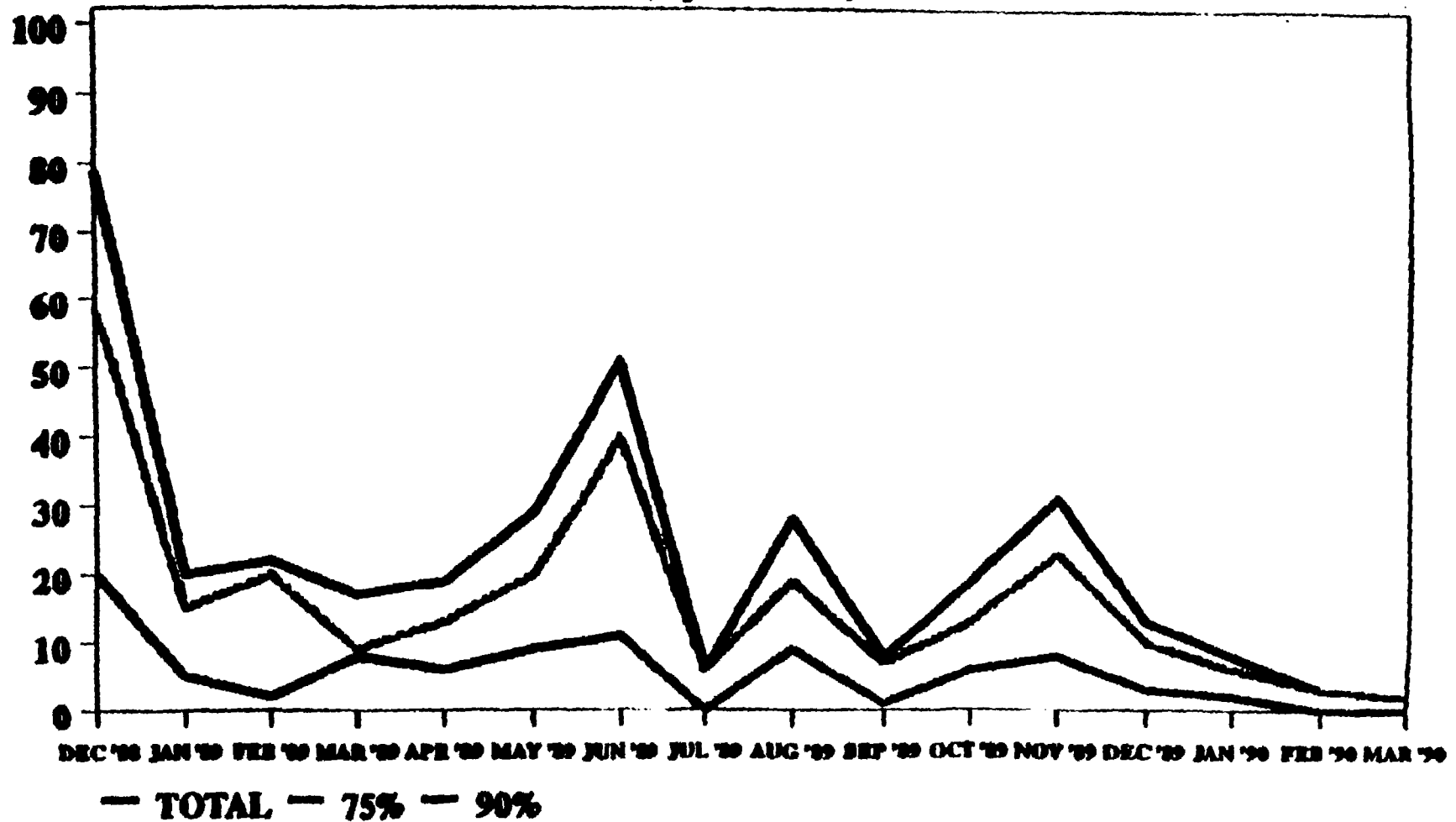
TGH

cc: TWC - SER, Houston

EXHIBIT 3

COMBINED TOTAL OF 75-90% LETTERS MAILED

(By Month)



NEW MEXICO

NEW MEXICO

The State of New Mexico, with assistance from the U.S. Environmental Protection Agency (EPA), has recently implemented a pilot program to assist communities with publicly owned treatment works (POTWs) to stay in compliance with their pollution discharge permits. The pilot program is called Improving Municipal Performances by Addressing Capacity (IMPAC) and was started at the end of 1989. This case study will provide some insights into the process used to plan and coordinate the program, the components of the program, and resources needed to implement the program.

PLANNING PROCESS

As the result of a number of factors, New Mexico had identified a major shortfall in available financing for POTW needs in the years 1995-2000. During these years, nearly all of the POTWs in the State will reach the end of their design lives. As POTWs reach this point, communities will be in need of several hundred million dollars to upgrade these facilities. Construction grants from the Federal government, which have been the principal source of funding for POTW construction, will be phased out by then and State loan repayments will still be too small to make up the shortfall.

New Mexico's Environmental Improvement Division (EID) and EPA began working together in mid-1989 to develop a pilot program that would help avert this problem. EPA was aware of a program designed by the State of Wisconsin to extend the design life of POTWs (for further information, see Wisconsin's case study). Using Wisconsin's Compliance Maintenance program as a model, EID and EPA developed New Mexico's IMPAC program. At this time, the IMPAC program is a pilot program, and no decision has been made yet on whether to make it a permanent program.

The goals of IMPAC are to:

- **protect the Federal, State, and local governments' investment of approximately \$450 million in the State's POTWs; and**
- **protect public health, and ground and surface water quality through assisting communities with planning for long-term compliance with discharge permit requirements.**

To achieve these goals, EID developed the following four objectives of the IMPAC program:

- **identify facilities that are approaching their treatment capacity;**
- **initiate planning modifications or additions necessary to maintain compliance;**
- **increase the useful life of POTWs by identifying and correcting performance limiting factors; and**
- **minimize municipal funds necessary to maintain POTW permit compliance.**

The State did not need to seek new legislation for the program for a number of reasons. First, IMPAC is only a pilot program. Second, the State did not need any new enforcement authority since IMPAC is purely a voluntary program. Third, EID sees its role under the program as consistent with its other missions.

A critical part of the planning process involved gathering officials from EID and EPA to develop the State's program. Staff from both agencies gathered to formulate a plan and develop the components

of IMPAC. EID's Surface Water Quality Bureau assigned the lead role for formulating IMPAC to their Wastewater Construction section. The Bureau Chief of this section gathered his staff as well as Bureau Chiefs and staff from the Facility Operations section, which is responsible for providing technical assistance to communities, and the Surface Water Section, which is responsible for administering the State's NPDES program. The Wastewater Construction section also invited a representative of New Mexico State University's Utility Operator Training Program to participate. The Utility Operator Training Program provides on-site technical assistance to POTW operators at no charge, and is often requested by EID to intervene in cases where the State feels its presence may exacerbate the situation.

These State officials, together with EPA regional staff, revised the questionnaire that Wisconsin developed to identify the performance and operating condition of its POTWs (Exhibit I). New Mexico, like Wisconsin, planned to use the questionnaire as an early warning system to gather information and screen those POTWs most in need of assistance. State officials, with assistance from EPA, also developed a schedule for implementing the program and planned a strategy to communicate the IMPAC program to communities with POTWs.

PUBLIC OUTREACH

EID felt that an informal, personalized public outreach strategy was the best way to inform the relatively few communities in the State with POTWs about the IMPAC program. The State organized a one-day workshop on the program and held them in four separate regions of the State to accommodate community officials. The State sent out letters of invitations addressed to the mayors of approximately 75 communities urging them or the city manager or public works director, along with their POTW's chief operator to attend one of the workshops. Along with the letter of invitation, EID also sent the IMPAC questionnaire soliciting performance and operation information on the community's POTW.

In addition to inviting community officials, EID also invited the Municipal League, an association that represents the communities in the State, to the workshop. This was done in an effort to gather the League's support for IMPAC and to use its influence with the communities to encourage their participation with the program. EID also disseminated information about IMPAC and the workshops through New Mexico State University's Utility Operator Training Program's newsletter in an effort to further target plant operators and elected community officials.

Since participation in the IMPAC program as well as the workshop is voluntary, the State encouraged attendance at the workshops by informing community officials in their invitation letters that all municipal officials that attend the workshop will receive, free of charge, a set of POTW operations manuals valued at over \$100. EID also followed up the letters of invitation with phone calls to those communities that had not yet responded. EID made a point to inform communities that information obtained from the questionnaire would not be used in any new enforcement actions that would not have been taken without that information. This was done to calm any fears that may have kept community officials from attending the workshops.

At the workshops EID and EPA explained the goals and the expected results of the IMPAC program and discussed the successes of the Wisconsin program. EID and EPA then facilitated a discussion period which allowed the community officials to ask questions and give feedback. After the general presentations, EID walked the community officials through each step of the questionnaire. The community officials were asked to bring the necessary information with them to complete the questionnaire, but EID also had its data bases available to provide any missing information. The workshop then continued as long as community officials sought assistance in completing the questionnaire.

IMPAC PROGRAM DESIGN

As mentioned above, the IMPAC Program is a voluntary program for municipalities. The State cannot force communities to submit any additional information on the performance of their POTWs. EID uses the voluntary aspect of the program as a selling point, encouraging community participation without the threat of retribution. EID is confident that its longstanding and intimate knowledge of all the POTWs' operations will compensate for the lack of mandatory participation in the program.

The major component of the program is the questionnaire distributed to communities (Exhibit I). The questionnaire acts as an early warning system, gathering information from community officials on performance trends and the physical conditions of their POTWs. The purpose of the questionnaire is to provide EID with readily retrievable data, in a centralized data source, on a variety of indicators of conditions at POTWs. These indicators cover a number of items including:

- monthly figures on influent flows and BOD loadings;
- effluent quality (e.g., mg/l of nitrate-nitrogen);
- age of the POTWs and type of treatment method;
- number of sewerage system bypasses;
- sludge management plans and treatment capacity;
- development pressures in the community;
- operator training and certification;

- financial status; and
- subjective questions on POTWs' conditions and plans for improvements.

The State asks POTW officials through the questionnaire to compare their data on influent flow and BOD loadings to the levels the plant was designed to handle and to compare their effluent quality data to the limits specified in the plants' discharge permits. The questionnaire generates point totals for the number of exceedances of these indicators as well as point totals for responses to the other indicator questions. Generally, POTWs with higher overall point totals have more serious performance and operation problems than POTWs with lower points. EID uses the point totals and other data obtained from the questionnaire to identify communities with POTWs that need special attention.

The State borrowed many of the indicators that it uses in the questionnaire from Wisconsin's Compliance Maintenance program. EPA encouraged the State to use Wisconsin's indicators where appropriate. The State concurred, feeling that these indicators provided the best representation of the engineering and financial performance of POTWs. The State also used the effluent quality indicators since these track with the water quality indicators used in the discharge permits. This allows the State to incorporate POTWs' compliance records into the screening process. EID revised some indicators from Wisconsin's questionnaire based on conditions specific to New Mexico, and also debated and changed the relative weighting that various indicators have on the overall point total.

The same EID and EPA staff members that were involved with planning the IMPAC program also reviewed the completed questionnaires. In selecting the communities for follow-up assistance, State officials used point totals on the questionnaire as well as their own best professional judgment. This was necessary because the review panel found that many of the communities with the highest point totals were currently addressing their problems and would have the situation corrected in less than a year. Therefore,

in addition to a high point total on the questionnaire, the panel added criteria that considered whether communities were already under an enforcement action or if they were currently seeking construction loans. Since the IMPAC program is a pilot study, the State also developed criteria that communities selected for further assistance must be representative of other communities and that State assistance will be targeted where it will produce the greatest benefits.

Based on this criteria, the State and EPA are working with four of the approximately 40 communities that returned questionnaires to help them improve the performance and operation of their POTWs. The State notified these communities with a summary of the data received from the IMPAC questionnaire as well as a letter informing the community of the problems with their POTW. EID and EPA personnel met with officials of these four communities, toured the POTWs, and discussed what assistance the community wanted. State assistance will be customized to the specific set of circumstances at a POTW. Assistance can vary widely, ranging from additional operator training, to the development of better diagnostic tests to improve plant operating efficiency, to overseeing equipment replacement or facility expansion. State assistance could also involve the financial operations of the facility including help with restructuring user rates, establishing equipment replacement funds, or establishing debt service funds. For those communities that the State did not identify as having potential compliance problems, the State sent a summary of the data from the IMPAC questionnaire and a letter confirming their POTW's satisfactory performance.

COMPLEMENTARY PROGRAMS

The IMPAC program is drawing on a number of other programs important to the goals of IMPAC that existed prior to the inception of this pilot program. For example, New Mexico offers as well as coordinates technical assistance for POTW operators. Much of this technical assistance is provided by New Mexico State University's Utility Operator Training Program which is funded through the University. The State's Surface Water Quality Bureau's Facility Operations section also provides technical assistance

through funds available from Sections 106 and 104(g) of the Clean Water Act. Communities can contact either the State or New Mexico State University for assistance or the State may contact a community directly.

Another program that IMPAC is drawing on is the POTW operator training and certification program. New Mexico State law requires POTW operators to receive training and pass certification examinations. The Surface Water Quality Bureau's Municipal Facilities section, in conjunction with the Utility Operators Association and New Mexico State University's Utility Operator Training Program, conducts operator training classes. After taking these classes, POTW operators must pass certification examinations administered by the State.

The State also incorporates water monitoring reports, required under other programs, into the IMPAC program. The Clean Water Act requires POTW operators to submit discharge monitoring reports on effluent quality. New Mexico also has a mandatory ground-water pollution discharge program that State officials see as similar in concept to a MWPP program. Under the ground-water program, the State requires all dischargers to file routine ground-water quality monitoring reports. The State also issues ground-water permits that limit effluent discharges. The State uses both the surface water as well as the ground-water monitoring reports as early warning systems to detect potential problems. EID's District Offices regularly respond to such problems with on-site visits to discuss possible remedies with dischargers, including POTW operators. The State has the authority under both the Clean Water Act and its ground-water program to initiate enforcement actions against dischargers who violate their permit limits.

RESOURCE INFORMATION

Money to finance the New Mexico IMPAC program comes mostly from grants to the State under the Clean Water Act. Staff time is financed through a few different sources including funds for the administration of construction grants under Section 205(g) of the Clean Water Act, funds for surface water

activities under Section 106, and funds from the State revolving fund. The State also provides its own funds, matching the Section 106 grants.

State officials estimated that it would take personnel resources equivalent to approximately 1 full time employee to plan and administer the IMPAC program for the first year. Planning the program required the time of five staff members for 13 full days, plus approximately 25 percent of the time of one other staff person.

The expertise of the staff members required to plan and administer the IMPAC program covered a variety of disciplines. Personnel included staff members from the enforcement section, the wastewater treatment operations section, the construction grants section, a sanitary engineer, a technical assistance specialist from a district office, and a Bureau Chief to coordinate the State's efforts.

The State currently provides these resources by diverting personnel away from their normal responsibilities. The State is considering, however, hiring a new staff member dedicated solely to IMPAC if this pilot program is made a permanent program. This IMPAC Coordinator would be responsible for the day-to-day administration of the program. He or she would coordinate the State's technical assistance activities for those communities whose POTWs were singled out by the program. The State is also considering administering the community questionnaire once a year. If that is the case, the IMPAC Coordinator would also be responsible for disseminating, collecting, and reviewing these questionnaires.

PROGRAM MANAGEMENT

State officials manipulated the data collected from the returned questionnaires by hand to identify which POTWs needed further assistance. Given the fact that the IMPAC program is a pilot study and that the data received were relatively limited, State officials saw no need to develop a data base management

system. Officials are still considering whether to develop this program into a permanent program. If they decide to make IMPAC a permanent program, officials will reevaluate the need for a data base management system at that time.

For more information on New Mexico's IMPAC Program, contact:

**Ms. Kathy Sisneros
Chief, Surface Water Quality Bureau
Environmental Improvement Division
State of New Mexico
505-827-2792**

EXHIBIT 1

MUNICIPAL WATER POLLUTION PREVENTION PROGRAM

Improving Municipal Performance by Addressing Capacity

NEW MEXICO IMPAC QUESTIONNAIRE

SUBMITTED BY :

MUNICIPALITY : _____

CONTACT PERSON : _____

MUNICIPAL OFFICIAL

TITLE

TELEPHONE # : _____

CHIEF OPERATOR : _____

NAME

TELEPHONE # : _____

DATE : _____

New Mexico IMPAC Questionnaire

*Improving Municipal Performance by Addressing Capacity

Part 1. INFLUENT LOADINGS/FLOW

A. List the average monthly volumetric flows and BOD₅ loadings received at your facility during the last calendar year.

		Col. 1 Average Monthly Influent Flow	Col. 2 Average Monthly Influent BOD ₅ concentrations	Col. 3 Estimated Average Influent Loading BOD ₅ loadings
		(MGD)	(mg/l)	(pounds per day)
1988	July	_____	_____	_____
	August	_____	_____	_____
	September	_____	_____	_____
	October	_____	_____	_____
	November	_____	_____	_____
	December	_____	_____	_____
1989	January	_____	_____	_____
	February	_____	_____	_____
	March	_____	_____	_____
	April	_____	_____	_____
	May	_____	_____	_____
	June	_____	_____	_____

** Estimated BOD₅ loading = AVG Monthly Flow (MGD) x AVG Monthly BOD₅ concentration (in mg/l) x 8.34.

NOTE: IMPAC is based on a program developed by the Wisconsin Department of Natural Resources

- B. List the average design flow and average BOD₅ loadings for your facility in the blank below. If you are not aware of these design quantities, refer to your O&M manual.

Average Design Flow (MGD)	Average Design BOD ₅ L ₀ (Pounds per day)
------------------------------	--

Design Criteria: _____

90% of the Design Criteria: _____

- C. How many times did the monthly flow (Col. 1) to the WTP exceed 90% design flow?
_____ (Circle the appropriate number)

0-4 = 0 points; 5 or more = 5 points

- D. How many times did the monthly flow (Col. 1) to the WTP exceed the design flow?
_____ (Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3-4 = 10 points;
5 or more = 15 points

- E. How many times did the monthly BOD₅ loading (Col. 3) to the WTP exceed 90% of the design loading? _____ (Circle the appropriate number)

0-1 = 0 points; 2-4 = 5 points; 5 or more = 10 points

- F. How many times did the monthly BOD₅ loading (Col. 3) to the WTP exceed the design loading? _____ (Circle the appropriate number)

0 = 0 points; 1 = 10 points; 2 = 20 points;
3 = 30 points; 4 = 40 points; 5 or more = 50 points

- G. Add together each point value you circled for C through F and place the sum in the blank below.

C points = _____

D points = _____

E points = _____

F points = _____

TOTAL POINT VALUE FOR PART 1

Enter this value on the point calculation table on the last page.

(1) Concentration

[illegible]

2. Loading

Month	BOD ₅ (lbs/day)	TSS (lbs/day)	NH ₃ -N or NO ₃ -N (lbs/day)	Total phosphorus (lbs/day)	Other
1988 July	_____	_____	_____	_____	_____
August	_____	_____	_____	_____	_____
September	_____	_____	_____	_____	_____
October	_____	_____	_____	_____	_____
November	_____	_____	_____	_____	_____
December	_____	_____	_____	_____	_____
1989 January	_____	_____	_____	_____	_____
February	_____	_____	_____	_____	_____
March	_____	_____	_____	_____	_____
April	_____	_____	_____	_____	_____
May	_____	_____	_____	_____	_____
June	_____	_____	_____	_____	_____

- A. List the monthly average permit limits for the facility in the blanks below. Circle whether your permit lists ammonia nitrogen ($\text{NH}_3\text{-N}$) or nitrate nitrogen ($\text{NO}_3\text{-N}$).

1. Concentration

	Fecal Coliform (count/100 ml)	BOD ₅ (mg/l)	TSS (mg/l)	$\text{NH}_3\text{-N}$ or $\text{NO}_3\text{-N}$ (mg/l)	Total Phosphorus (mg/l)	Other (list)
Permit Limit:	_____	_____	_____	_____	_____	_____
90% of the Permit Limit:	_____	_____	_____	_____	_____	_____

2. Loading

	BOD ₅ (lbs/day)	TSS (lbs/day)	$\text{NH}_3\text{-N}$ or $\text{NO}_3\text{-N}$ (lbs/day)	Total Phosphorus (lbs/day)	Other (list)
Permit Limit:	_____	_____	_____	_____	_____
90% of the Permit Limit:	_____	_____	_____	_____	_____

- C. How many months did the effluent BOD₅ concentration (mg/l) or loading (lbs/day) exceed 90% of permit limits? _____ (Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points
5 or more = 40 points

- D. How many months did the effluent BOD₅ concentration (mg/l) or loading (lbs/day) exceed permit limits? _____ (Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 30 points

- E. How many months did the effluent TSS concentration (mg/l) or loading (lbs/day) exceed 90% of the permit limits? _____ (Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points;
5 or more = 40 points

- F. How many months did the effluent TSS concentration (mg/l) or loading (lbs/day) exceed permit limits? _____ (Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 30 points

- G. How many months did the effluent Ammonia-Nitrogen or Nitrate-Nitrogen concentration (mg/l) or loading (lbs/day) exceed 90% of the permit limits? _____ (Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points
5 or more = 40 points

- H. How many months did the effluent Ammonia-Nitrogen or Nitrate-Nitrogen limit exceed permit limits? _____ (Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 30 points

- I. How many months did the effluent fecal coliform concentration exceed 90% of the permit limits? _____ (Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points
5 or more = 40 points

- J. How many months did the effluent fecal coliform concentration exceed permit limits? _____ (Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 30 points

- K. How many months did the effluent Phosphorus concentration (mg/l) or loading (lbs/day) exceed 90% of the permit limits? _____ (Circle the appropriate number)

0-1 = 0 points; 2 = 10 points; 3 = 20 points; 4 = 30 points
5 or more = 40 points

- L. How many months did the effluent Phosphorus concentration (mg/l) or loading (lbs/day) exceed permit limits? _____ (Circle the appropriate number)

0 = 0 points; 1-2 = 5 points; 3 or more = 30 points

- M. Add each point value circled for C through L and place in the blank below.

C points = _____ G points = _____ K points = _____

D points = _____ H points = _____ L points = _____

E points = _____ I points = _____

F points = _____ J points = _____

TOTAL POINT VALUE FOR PART 2

Enter this value on the point calculation table on the last page.

Part 3: AGE OF THE WASTEWATER TREATMENT FACILITIES

- A. What year was the wastewater treatment plant constructed or last major expansion to increase the hydraulic capacity of the plant completed. _____

1989 - (Answer to A.) = Age in years

1989 - _____ = _____ Years

Enter Age in Part C., below.

- B. Check the type of treatment facility that is employed:

	<u>Factor</u>
_____ Mechanical Treatment Plant	2.0
_____ Aerated Lagoon	1.5
_____ Stabilization Pond	1.0
_____ Other (Specify) _____	<u>1.0</u>

- C. Multiply the factor listed next to the type of the facility your community employs by the age of your facility to determine the total point value of Part 3:

$$\text{TOTAL POINT VALUE FOR PART 3} = \frac{\text{Factor}}{\text{Factor}} \times \frac{\text{Age}}{\text{Age}} = \boxed{}$$

Enter this value or 40, which ever is less, on the point calculation table on the last page.

Part 4: BYPASSING FROM TRIBUTARY SEWERAGE SYSTEM(S)

- A. How many times in the last year was there a bypass or overflow of untreated wastewater either at the treatment plant or within the collection system due to heavy rain or snowmelt? _____ (Circle One)

0 = 0 points 1 = 5 points; 2 = 10 points; 3 = 15 points;
4 = 30 points 5 or more = 50 points

- B. Specify how many of the bypasses or overflows were within the collection system or treatment plant.

Collection System _____ Treatment Plant _____

- C. How many days in the last year was there a bypass or overflow of untreated wastewater due to equipment failure either at the treatment plant or due to pump problems in the collection system? _____ (Circle One)

0 = 0 points; 1 = 5 points; 2 = 10 points; 3 = 15 points;
4 = 30 points; 5 or more = 50 points

- D. Specify how many of the bypasses or overflows were within the collection system or at the treatment plant.

Collection system _____ Treatment plant _____

- E. Specify whether the bypasses came from the city or village sewer system or from contract or tributary communities/sanitary districts, etc.

TOTAL POINT VALUE FOR PART 4

Enter this value on the point calculation table on the last page.

PART 5: ULTIMATE DISPOSITION OF SLUDGE

A. What is final disposition of sludge from your treatment plant?

If sludge is not land applied, go to Part 6.

B. If land applied, is there plant cover on the site?

_____ Yes (Complete question C.)

_____ No (Complete question D.)

C. What type of cover is on the site?

_____ Crops consumed by animals whose products are consumed by humans.
(Complete Question D.)

_____ Crops that are directly consumed by humans.
(Complete Question E.)

_____ Neither directly nor indirectly consumed by humans.
(Complete Question D.)

D. Does your treatment plant have the capability of meeting the sludge disposal requirements of 40 CFR Part 257 Appendix II for providing Processes to Significantly Reduce Pathogens (PSRP)?

_____ Yes.....0 points

_____ No.....50 points

What process is used? _____

Go to question F.

- E. Does your treatment plant have the capability of meeting the sludge disposal requirements of 40 CFR Part 257 Appendix II for providing Processes to Further Reduce Pathogens (PFRP)?

_____ Yes.....0 Points

_____ No.....50 Points

What process is used? _____

- F. Does the site have a Groundwater Discharge Permit?

_____ Yes.....0 Points

_____ No.....50 Points

TOTAL POINT VALUE FOR PART 5

--

Enter this value on the point calculation table on the last page.

PART 6: LANDFILLING OF SLUDGE

- A. Does your facility have access to sufficient land disposal sites for:
(Circle the appropriate point total)

3 or more years = 0 points

24-35 months = 10 points

12-23 months = 20 points

6-12 months = 30 points

less than 6 months = 50 points

- B. If disposal by a landfill, is the landfill registered and has a Groundwater Discharge Plan been submitted?

____ Yes.....0 points

____ No.....50 points

TOTAL POINT VALUE FOR PART 6

--

Enter this value on the point calculation table on the last page.

Part 7: NEW DEVELOPMENT

- A. Please provide the following information for the total of all sewer line extensions which were installed during the last calendar year.

Design Population: _____ Design Flow: _____ MGD Design BOD₅: _____

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings to the sewerage system were significantly increased (10-20%)? (Circle One)

No = 0 points; Yes = 15 points

- C. Is there any major development (industrial, commercial, or residential) anticipated in the next 2-3 years, such that either flow or pollutant loadings to the sewerage system could significantly increase (Circle One)

No = 0 points; Yes = 15 points

- D. Add the point values circled in B and C and enter the sum below.

TOTAL POINT VALUE FOR PART 7

--

Enter this value on the point calculation table on the last page.

A. Responsible person-in-charge of operation per shift.

SHIFT: _____
NAME: _____ TELEPHONE #: _____
CERTIFICATION #: _____ LEVEL: _____

LEVEL OF CERTIFICATION REQUIRED

SHIFT: _____
NAME: _____ TELEPHONE #: _____
CERTIFICATION #: _____ LEVEL _____

LEVEL OF CERTIFICATION REQUIRED

SHIFT: _____
NAME: _____ TELEPHONE #: _____
CERTIFICATION #: _____ LEVEL _____

LEVEL OF CERTIFICATION REQUIRED _____

[illegible]

C. Staffing identified in O&M Manual.

<u>TYPE/TITLE:</u>	<u>NUMBER OF EACH</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
TOTAL _____	

COMMENTS: _____

D. Points determination for operator certification and training.
Circle the appropriate point totals below.

a. Certification level for responsible persons in charge:

Meets or exceeds required level. = 0

Below required level. = 30

b. Training credits for last 36 months:

All staff has \geq 30 credits = 0Some staff < 30 credits
but all staff has \geq 10 credits = 15One or more staff has \leq 10 points = 30

c. Staffing for wastewater treatment system:

Equals or exceeds O&M Manual recommendations = 0

No O&M Manual = 30

Less Than O&M Manual recommendation = 60

d. TOTAL POINT VALUE FOR PART 8

Enter this value on the point calculation table on the last page.

PART 9: FINANCIAL STATUS

- A. List your annual O&M costs, replacement costs, debt service costs, training costs, and revenue for wastewater and debt service.

Annual Cost

O&M: \$ _____

Replacement: \$ _____

Debt Service: \$ _____

Training: \$ _____

Wastewater Revenue: \$ _____

Debt Service Revenue: \$ _____

- B. Are the funds for wastewater treatment facilities separate from other community funds? If no, explain. _____
- _____
- _____

- C. Are all users or user classes charged based on the proportionate share?

(Circle One) Yes No

If not, why not? _____

- D. Are the equipment replacement funds in a segregated account? (Circle One) Yes No

(Equipment replacement, such as motors, pumps bearings etc., for the useful life of the treatment facility).

Equipment Replacement Fund

Beginning Balance: \$ _____ Date: _____

Additions: + \$ _____

Disbursements: - \$ _____

Ending Balance: \$ _____ Date: _____

- E. What financial resources do you have available to pay for your wastewater improvement reconstruction needs? (excluding routine maintenance replacement mentioned in D above) _____
- _____
- _____

PART 10: SUBJECTIVE EVALUATION

- A. Describe briefly the physical and structural conditions of the treatment facilities
-
-
-
- B. Describe the conditions of the collection/conveyance system including lift stations (i.e. age of sewers, infiltration/inflow etc.)
-
-
-
- C. What sewerage system improvements does the community have under consideration for next 10 years?
-
-
-
- D. What was the theoretical design life of the plant and what do you believe is the remaining useful life of the wastewater treatment facilities?
-
-
- E. What problems, if any, have been experienced over the last year that have threatened collection or treatment of wastewater
-
-
-
-

F. Is your community presently involved in formal planning for treatment facility upgrading? If yes, describe: _____

G. How many times in the last year were there overflow or backups at any point in the collection system for any reason, except clogging of the service lateral connection?

_____ Times

H. Does your treatment system have a written operation and maintenance program including a preventive maintenance program on major equipment items and sewer collection system? (Circle one) Yes. No. If yes, describe: _____

I. Does this preventive maintenance program depict frequency of intervals, types of lubrication, types of repair and other preventive maintenance tasks necessary for each piece of equipment or each section of sewer? (Circle one) Yes No

J. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assessed properly?

(Circle one) Yes No

K. How many times has the operator-in-charge attended the State of New Mexico certification exam sessions in the last two years? _____ times

L. What portion of the continuing education expenses of the operator-in-charge were paid for by the permittee (municipality) ? _____ by the operator? _____
 What percentage of the wastewater budget is dedicated for training? _____ %

- M. Is there a written policy encouraging continuing education and training for wastewater treatment plant employees? (Circle One) Yes No

Explain Policy:

- N. Describe any major repairs or mechanical equipment replacement that you made in the last year and include the approximate cost for those repairs. Do not include major treatment plant construction or upgrading program.

0. Any additional comments? (Attach additional sheets if necessary.)

POINT CALCULATION TABLE

Fill in the Values from parts 1 through 8 in the column below. Add the numbers in the left column to determine the IMPAC point total that the wastewater system has generated for the previous calendar year.

<u>Actual Values</u>		<u>Maximum Possible</u>
Part 1	_____ points	80 points
Part 2	_____ points	350 points
Part 3	_____ points	40 points
Part 4	_____ points	100 points
Part 5	_____ points	150 points
Part 6	_____ points	100 points
Part 7	_____ points	30 points
Part 8	_____ points	120 points
TOTAL	<div style="border: 1px solid black; width: 150px; height: 40px; display: inline-block;"></div> points	970 points